



**Australian Government**  
**Anti-Dumping Commission**

**PUBLIC RECORD**

**CUSTOMS ACT 1901 - PART XVB**

# **CONSIDERATION REPORT NO. 249**

**APPLICATION FOR A DUMPING DUTY NOTICE**

**ZINC COATED (GALVANISED) STEEL EXPORTED FROM  
INDIA AND THE SOCIALIST REPUBLIC OF VIETNAM**

**8 July 2014**

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### ABBREVIATIONS

ABS	Australian Bureau of Statistics
ACBPS	Australian Customs and Border Protection Service
The Act	<i>Customs Act 1901</i>
AD Agreement	World Trade Organisation Anti-Dumping Agreement
The applicant	BlueScope Steel Limited
AUD	Australian dollars
CIF	Cost, insurance and freight
Commission	Anti-Dumping Commission
the Commissioner	the Commissioner of the Anti-Dumping Commission
CON 249	Consideration Report No. 249
CTMS	Cost to make & sell
FIS	Free-in-store
FOB	Free-on-board
HRC	Hot rolled coil
IPP	Import parity pricing
ISSB	International Steel Statistics Bureau
NIP	Non-injurious price
REP 190	Trade Measures Report No. 190
SG&A	Selling, general and administrative
the goods	the goods the subject of the application (also referred to as the goods under consideration)
the Parliamentary Secretary	the Parliamentary Secretary to the Minister for Industry
TCO	Tariff Concession Order
USP	Unsuppressed selling price
ZF	Zinc converted to a zinc/iron alloy coating

## 1 SUMMARY AND RECOMMENDATION

### 1.1 Background

This Consideration Report (CON 249) provides the Anti-Dumping Commission's (the Commission's) consideration of an application lodged by BlueScope Steel Limited (BlueScope) for the publication of a dumping duty notice in respect of zinc coated (hereafter referred to as galvanised) steel<sup>1</sup> from India and the Socialist Republic of Vietnam (Vietnam).

### 1.2 Application of law to facts

Division 2 of Part XVB of the *Customs Act 1901* (the Act)<sup>2</sup> sets out procedures for considering an application for a dumping duty notice.

#### 1.2.1 The role of the Commission

The Commission is responsible for preparing a report for the Commissioner of the Anti-Dumping Commission (the Commissioner) examining an application for a dumping duty notice.

In this report, the following matters are considered in relation to the application:

- whether the application complies with subsection 269TB(4);
- whether there is, or is likely to be established, an Australian industry in respect of like goods; and
- whether there appear to be reasonable grounds for the publication of a dumping duty notice in respect of the goods the subject of the application.

#### 1.2.2 The role of the Commissioner

The Act empowers the Commissioner, after having regard to this report and to any other information that the Commissioner considers relevant, to reject or not reject an application for the publication of a dumping duty notice.

If the Commissioner decides not to reject the application, the Commissioner must give public notice of the decision providing details of the investigation.

### 1.3 Findings and conclusions

The Commission has examined the application lodged by BlueScope for the publication of a dumping duty notice on galvanised steel exported from India and Vietnam and is satisfied that:

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<sup>1</sup> Refer to the full description of the goods in Section 2.2 of this report.

<sup>2</sup> All references in this report to sections of legislation, unless otherwise specified, are to the *Customs Act 1901*.

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- the application complies with the requirements of subsection 269TB(4) (the reasons for being satisfied are set out in Chapter 3 of this report);
- there is an Australian industry in respect of like goods (as set out in Chapter 4 of this report); and
- there appear to be reasonable grounds for the publication of a dumping duty notice in respect of the goods the subject of the application (as set out in Chapters 5, 6 and 7 of this report).

### 1.4 Recommendation

The Commission recommends that the Commissioner decide not to reject the application.

If the Commissioner accepts this recommendation, to give effect to that decision, the Commissioner must publish the notice at **Appendix 1** indicating that the Commission will inquire into whether grounds exist to publish a dumping duty notice in respect of galvanised steel.

## 2 BACKGROUND

### 2.1 Application

On 8 May 2014 an application was lodged on behalf of BlueScope requesting that the Parliamentary Secretary to the Minister for Industry (the Parliamentary Secretary)<sup>3</sup> publish a dumping duty notice in respect of certain galvanised steel<sup>4</sup> exported to Australia from India and Vietnam.

BlueScope provided further information and data in support of its application on three occasions, the last of which was received on 26 June 2014. As a result, the Commission restarted the 20 day period for considering the application in accordance with subsection 269TC(2A).

BlueScope alleges that the Australian industry has suffered material injury caused by galvanised steel exported to Australia from India and Vietnam at dumped prices.

BlueScope claims that the industry had been injured through:

- price suppression;
- reduced profit and profitability;
- reduced return on investment;
- reduced employment numbers; and
- reduced ability to raise capital for re-investment.

### 2.2 The goods the subject of the application

#### 2.2.1 Description

The goods the subject of the application (the goods) are defined as follows:

*'flat rolled iron or steel products (whether or not containing alloys) that are plated or coated with zinc exported to Australia from India and Vietnam'<sup>5</sup>*

These goods are generically called galvanised steel. Galvanised steel of any width is included in this application.

#### Exclusions

These goods do not include painted galvanised steel, pre-painted galvanised steel, electro-galvanised steel, corrugated galvanised steel or aluminium zinc alloy coated or plated steel.<sup>6</sup>

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<sup>3</sup> Responsibility for anti-dumping matters was transferred to the Minister for Industry on 25 September 2013. The Minister for Industry subsequently delegated responsibility for anti-dumping matters to the Parliamentary Secretary to the Minister for Industry.

<sup>4</sup> Refer to the full description of the goods in Section 2.2 of this report.

<sup>5</sup> Galvanised Steel Application, page 11.

<sup>6</sup> Galvanised Steel Application, page 11.

## **2.2.2 Additional information**

BlueScope's application also provided additional information to support its description of the goods, as follows:<sup>7</sup>

*'The goods include the same categories of goods as identified in Trade Measures Report No. 190 and 193, however, this application also includes goods that are alloyed (i.e. with minor additions, e.g. boron, chromium, etc). The goods the subject of this application include all zinc coated product options, including all grades/models of zinc coated steel, all coating mass classes and all surface treatments.*

*Trade or further generic names often used to describe the goods the subject of the application include:*

- *"GALVABOND®" steel*
- *"ZINCFORM®" steel*
- *"GALVASPAN®" steel*
- *"ZINCHITEN®" steel*
- *"ZINCANNEAL" steel*
- *"ZINCSEAL" steel*
- *Galv*
- *GI*
- *Hot Dip Zinc coated steel*
- *Hot Dip Zinc/Iron alloy coated steel*
- *Galvanneal*

*The amount of zinc coating on the steel is described as its coating mass and is nominated in grams per meter squared (g/m<sup>2</sup>) with the prefix being Z (Zinc) or ZF (Zinc converted to a Zinc/Iron alloy coating). The common coating masses used for zinc coating are: Z350, Z275, Z200/Z180, Z100, and for zinc/iron alloy coatings are ZF100, ZF80 and ZF30 or equivalents based on international standards and naming conventions.*

*Surface treatments can include but not be limited to; passivated or not passivated (often referred to as chromated or unchromated), oiled or not oiled, skin passed or not skin passed, phosphated or not phosphated (for zinc iron alloy coated steel only).*

*There are a number of relevant International Standards for zinc coated products that cover their own range of products via specific grade designations, including the recommended or guaranteed properties of each of these product grades.*

*These relevant standards are noted below in Table A-3.1 "Relevant International Standards for zinc coated steel".*

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<sup>7</sup> Galvanised Steel Application, pages 11-12.



**Table A-3.1 - Relevant International Standards for zinc coated steel**

International Standards	Product Grade Names
<b>General and Commercial Grades</b>	
AS/NZS 1397	G1, G2
ASTM A 653/A 653M	CS type A, B and C
EN10346	DX51D, DX52D
JIS 3302	SGCC, SGHC
<b>Forming, Pressing &amp; Drawing Grades</b>	
AS/NZS 1397	G3
ASTM A 653/A 653M	FS, DS type A and B
EN10346	DX53D, DX54D
JIS 3302	SGCD, SGCDD,
<b>Structural Grades</b>	
AS/NZS 1397	G250, G300, G350, G450, G500, G550
ASTM A 653/A 653M	33 (230), 37 (255), 40 (275), 50 (340), 55 (380), 80 (550)
EN10346	S220GD, S250GD, S280GD, S320GD, S350GD, S550GD
JIS 3302	SGC340, SGC400, SGC440, SGC490, SGC570 SGH340, SGH400, SGH440, SGH490, SGH570

*Please refer to Non-Confidential Attachment A-3.1 for a comparison of AS/NZ 1397 with other International Standards for zinc coated steel.'*

### 2.2.3 Tariff classification

The application states that galvanised steel is classified to the following tariff subheadings in Schedule 3 to the *Customs Tariff Act 1995*:

- 7210.49.00 (statistical codes 55, 56, 57 and 58);
- 7212.30.00 (statistical code 61);
- 7225.92.00 (statistical code 38); and
- 7226.99.00 (statistical code 71).

Based on the information provided in the application, it has been confirmed by the Trade Policy and Advice section of the Australian Customs and Border Protection Service (ACBPS) that galvanised steel is correctly classified to these tariff subheadings.

The general rate of duty is currently 5% for goods imported under these tariff subheadings. However, imports from India and Vietnam are subject to a DCS duty rate which is free for non-alloy steel under 7210.49.00 and 7212.30.00 and is 4% for 'other alloy' steel under 7225.92.00 and 7226.99.00.<sup>8</sup>

### 2.2.4 Tariff Concession Orders

A list of the Tariff Concession Orders (TCOs) that are applicable to the tariff subheadings identified above is provided at **Attachment A1**.<sup>9</sup> There are also a number of exemptions that currently apply to existing anti-dumping measures (Section 2.4.1 refers), as outlined at **Attachment A2**.

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<sup>8</sup> 'DCS' is a code applied to classes of countries and places in relation to which special rates apply as specified in Part 4 of Schedule 1 to the *Customs Tariff Act 1995*.

<sup>9</sup> In identifying the TCOs applicable to the tariff subheadings in this section, the Commission does not comment on their relevance to the goods the subject of the application.

## **2.3 Consideration of the application**

Under subsection 269TC(1) the Commissioner must examine an application for publication of a dumping duty notice upon its receipt and, within 20 days of lodgement (or 20 days of lodgement of further information in support of the application), decide whether or not to reject the application.

In relation to this application, a decision must be made no later than **16 July 2014**.<sup>10</sup>

Subsection 269TC(1) specifies that the Commissioner shall reject the application if he is not satisfied that:

- the application complies with subsection 269TB(4); or
- there is, or is likely to be established, an Australian industry in respect of like goods; or
- there appear to be reasonable grounds for the publication of a dumping duty notice in respect of the goods the subject of the application.

The above matters are examined in the following sections of this report.

## **2.4 Previous investigations**

### **2.4.1 Australia**

An investigation into the dumping and subsidisation of galvanised steel and aluminium zinc coated steel exported to Australia from the People's Republic of China (China), Korea and Taiwan was finalised on 30 April 2013 (refer Trade Measures Report No. 190) (REP 190). As a result of this investigation, a dumping duty notice was published for all exports of galvanised steel from:

- China by all exporters;
- Korea by all exporters, other than Union Steel Co., Ltd;<sup>11</sup> and
- Taiwan by all exporters, other than Sheng Yu Co., Ltd and Ta Fong Steel Co., Ltd.<sup>12</sup>

It is observed that the goods in REP 190 were limited to zinc coated products of iron and *non-alloy* steel only.

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<sup>10</sup> This consideration due date reflects the last day of receipt of substantial new information provided in respect to the application in accordance with subsection 269TC(2A).

<sup>11</sup> On 26 April 2013 the dumping investigation was terminated, in so far as it related to galvanised steel exported by Union Steel Co., Ltd, Sheng Yu Co., Ltd and Ta Fong Steel Co., Ltd, based on a finding that the dumping margins for goods exported by those companies during the investigation period were less than 2% (refer Termination Report No. 190A).

<sup>12</sup> See above.

## **2.4.2 International<sup>13</sup>**

### **(i) South America**

An investigation into the alleged dumping of certain flat-rolled products of iron or non-alloy steel plated or coated with tin from Australia, China, India, Mexico and South Korea was initiated by Brazil in April 2011 (following an application made by the Brazilian enterprise Companhia Siderúrgica Nacional). The investigation was terminated in September 2012, based on a finding that there was an absence of material injury to the domestic industry.

The products subject to investigation were classified under the following items in Brazil's Harmonized System: 7210.30.10, 7210.49.10, 7210.61.00 and 7210.70.10.

### **(ii) European Union**

On 14 December 2007, the European Commission initiated anti-dumping proceedings concerning imports of certain hot-dipped metallic-coated iron or steel flat-rolled products originating in mainland China. On 7 February 2009, the European Commission terminated the anti-dumping proceedings following the withdrawal of the complaint by the applicant (on 11 December 2008) (Official Journal Decision 2009/106/EC refers).<sup>14</sup>

## **2.5 Current anti-dumping measures**

As outlined in Section 2.4.1, there are currently anti-dumping measures in place for galvanised steel (not containing alloys) exported to Australia from China, Korea and Taiwan.

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<sup>13</sup> The mere fact that allegations of dumping have been initiated in other anti-dumping jurisdictions does not indicate that dumping is likely to have occurred in relation to goods exported to Australia.

<sup>14</sup> According to the complainant, this withdrawal was prompted by market factors. The complainant did not want to pursue its case on volume-based threat of injury, which was based on an analysis of historic data that no longer fully reflected current market conditions. According to the complainant, it was preferable to respond in these circumstances to unfair injurious trade practices, should they occur, through a new case.

### **3 COMPLIANCE WITH SUBSECTION 269TB(4)**

Subsection 269TB(4) requires that the application must:

- be in writing; and
- be in an approved form; and
- contain such information as the form requires; and
- be signed in the manner indicated by the form; and
- be supported by a sufficient part of the Australian industry.

#### **3.1 Approved form**

The application is in writing, is in the approved form (a B108 application form), contains such information as the form requires (as discussed in the following sections of this report) and is signed in the manner indicated in the form.

BlueScope submitted confidential and public record versions of the application, along with numerous appendices and attachments. The Commission considers that the public record version of the application contains sufficient detail to allow a reasonable understanding of the substance of the information contained within the confidential application.<sup>15</sup>

#### **3.2 Supported by Australian industry**

An application is taken to be supported by a sufficient part of the Australian industry if the Commission is satisfied that the persons who produce or manufacture like goods in Australia and who support the application:

- account for more than 50% of the total production or manufacture of like goods by that proportion of the Australian industry that has expressed either support for, or opposition to, the application; and
- account for not less than 25% of the total production or manufacture of like goods in Australia.

The application states that BlueScope is the only Australian producer of galvanised steel. Based on the evidence provided and the Commission's inquiries, the Commission considers the application is supported by a sufficient part of the Australian industry.

#### **3.3 The Commission's assessment**

Based on the information submitted by BlueScope, the Commission considers that the application complies with subsection 269TB(4).

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<sup>15</sup> This assessment is based on the revised public version application provided by BlueScope on 26 June 2014.

## 4 LIKE GOODS AND THE AUSTRALIAN MARKET

Subsection 269TC(1) requires that the Commissioner must reject an application for a dumping duty notice if, inter alia, he is not satisfied that there is, or is likely to be established, an Australian industry in respect of like goods.

### 4.1 Locally produced like goods

Subsection 269T(1) defines like goods as:

*'goods that are identical in all respects to the goods under consideration or that, although not alike in all respects to the goods under consideration, have characteristics closely resembling those of the goods under consideration.'*

#### 4.1.1 BlueScope's claims

The application states that BlueScope manufactures flat rolled products of iron and non-alloy steel, of widths less than 600mm and widths equal to or greater than 600mm, plated or coated with zinc. These products manufactured by BlueScope are marketed under the trade names GALVABOND®, ZINCFORM®, GALVASPAN®, ZINCHITEN®, ZINCANNEAL and ZINCSEAL steel. These products are sold into the Australian market direct to manufacturing customers and via distributors.

BlueScope considers that the locally produced goods are like products to the imported flat rolled products of iron or steel, plated or coated with zinc. Specifically, BlueScope submitted that:

- (i) *Physical likeness*
  - products made locally by BlueScope have a physical likeness to the goods exported from India and Vietnam (the countries named in the application);
  - BlueScope's locally produced galvanised steel and the imported goods are manufactured to Australian and International Standards;
- (ii) *Commercial likeness*
  - Australian industry galvanised steel competes directly with imported galvanised steel in the Australian market;
  - the locally produced goods and imported goods are offered for sale to the market via similar channels, and on similar commercial terms and conditions;
- (iii) *Functional likeness*
  - both the locally produced and imported galvanised steel have comparable or identical end-uses;
- (iv) *Production likeness*
  - locally produced and imported galvanised steel are manufactured in a similar manner and via similar production processes.

On this basis, BlueScope considers that its locally-produced galvanised steel is like to the imported goods, and possesses the same essential characteristics as the imported galvanised steel.

Although BlueScope does not manufacture galvanised steel containing alloys, its application stated that other alloy zinc coated products are wholly substitutable with iron and non-alloy zinc coated steel products.<sup>16</sup> BlueScope also provided an email from one of its customers that indicated the addition of boron has no effect on functionality.

#### **4.1.2 The Commission's assessment**

The Commission has examined the evidence presented in the application and is satisfied at the consideration stage that the Australian industry produces like goods to the goods the subject of the application (including those goods that comprise other alloy steel), as defined in subsection 269T(1).

Based on the domestic sales data provided in Confidential Appendix A4 in respect of galvanised steel, the Commission was able to verify that BlueScope manufactured and supplied galvanised steel in a range of widths (including less than 600mm and equal to or greater than 600mm) and thicknesses, which covered the thickness range identified for the tariff subheadings and statistical codes for the goods.

## **4.2 Manufactured in Australia**

Subsections 269T(2) and 269T(3) specify that, for goods to be regarded as being produced in Australia, they must be wholly or partly manufactured in Australia. In order for the goods to be considered as partly manufactured in Australia, at least one substantial process in the manufacture of the goods must be carried out in Australia.

### **4.2.1 Applicant's manufacturing operations**

BlueScope is a fully-integrated flat steel product manufacturer with large capital intensive manufacturing operations in Springhill and Port Kembla in New South Wales and Western Port in Victoria.

BlueScope manufactures Hot Rolled Coil (HRC) in Australia from liquid steel, via flat steel production. The steel production process is capital intensive and BlueScope does not use imported steel in the manufacture of the goods.

BlueScope stated in its application that slab (the input steel product) is heated in a furnace to around 1200 degrees Celsius and is then reduced in thickness from 230mm to below 5mm by passing through a series of rollers at great pressure. It is then control cooled, and finally wound up as a coil of steel (known as HRC).

The HRC is then further processed by passing through hydrochloric acid baths to remove surface scale and is edge trimmed to the customer-specified width.

The next process is cold rolling, which is a similar process to hot rolling but is done at ambient temperature. This is where the coil is reduced in thickness to the customer requirement, generally 0.30mm to 1.6mm base metal thickness.

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<sup>16</sup> Galvanised Steel Application, page 13.

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This cold rolled steel is the input feed material to the continuous coating line and runs continuously through several key processes:

1. cleaning;
2. annealing;
3. passing through a molten bath mixture of zinc, antimony and other trace metals (hot dipping); and
4. various surface treatments, depending on the customer's specific requirements.

The range of options for zinc coated steel includes a skin passed or un-skin passed surface, chromated or un-chromated surface or an oiled or dry surface. For ZF coated steel the option is for a skin passed or un-skin passed surface.

The ZF coating process is the same as a zinc coating process, except that instead of the zinc coating solidifying onto the steel, it is passed through a furnace to fuse the zinc coating with iron from the steel, to make a matt finish that is designed as a surface ready to paint.

In respect of galvanised steel, BlueScope submits that it undertakes more than one substantial process of manufacture in the production of the goods.

### **4.2.2 The Commission's assessment**

Based on the description provided by BlueScope of its manufacturing process for galvanised steel, the Commission is satisfied that there is at least one substantial process of manufacture performed in Australia and that the goods may therefore be taken to have been produced in Australia.

## **4.3 Australian Market**

In its application BlueScope referenced REP 190 which stated that galvanised steel was sold into the 'building and construction, manufacturing, automotive and transport primary market sectors' (Section 4.3.1 refers). BlueScope also stated that the end use application of each product varies within the primary market sectors. It claimed that locally produced and imported goods are used interchangeably across a variety of applications in the Australian market.

### **4.3.1 Market segmentation and demand variability<sup>17</sup>**

BlueScope stated in its application that the Australian market has two key market segments, namely the building and construction industry segment (largest by volume) and the smaller manufacturing industry segment.

BlueScope provided examples of end use applications for galvanised steel in the building and construction industry (both residential and non-residential), such as purlins and girts,

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<sup>17</sup> This section regarding market segmentation and demand variability is based on information provided in the application. Further investigation regarding similarities and differences in the market segments and demand factors for galvanised steel is required, as well as the degree of suitability between the products.

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framing, structural decking (flooring systems), air-conditioning ductwork, plastering accessories and nail plate.

Further examples provided by BlueScope of end use applications for galvanised steel in manufacturing include feedstock as input for pipe and tube manufacture, automotive components, racking systems, metre boxes and silo components.

The application claimed there are a variety of factors that influence demand variability for galvanised steel within the Australian market, including:

- seasonal fluctuations:
  - impacts on agriculture, such as silos depending on season;
  - building industry Christmas closures directly impacting construction;
  - wet versus dry season in tropical climates impacting construction;
- factors contributing to overall market growth or decline:
  - availability of capital for infrastructure spending (government and private);
  - general macroeconomic factors, such as bank interest rates, directly impacting on investment decisions by home buyers, investors and developers;
  - global and domestic economic conditions (gross domestic product, unemployment, inflation, interest rates);
  - global and domestic business and consumer confidence;
- government regulation:
  - standards – international manufacturers do not always manufacture to the same standards as Australian manufacturers (BlueScope claim this is not understood until installation);
  - policy – major government spending on infrastructure, such as the school building revolution;
  - new home rebates, which can pull forward demand;
- short term pricing volatility:
  - pressure on Australian manufacturing to compete with imported finished products;
  - influence on purchasing decisions for inventory levels;
  - more evident in the indirect distribution channel;
  - influenced via global steel capacity utilisation; and
  - has a seasonal element.

### 4.3.2 Marketing and Distribution

BlueScope's application stated that a proportion of galvanised steel sales are made directly to the domestic building product manufacturing industry. It is this industry that roll forms the galvanised steel into building products, such as structural sections for commercial buildings, garages and sheds as well as structural decking. These manufacturers then distribute the manufactured products to builders.

BlueScope also stated that the balance of sales is made to either the local distribution market (via distributor/resellers) or direct to the general manufacturing and automotive



industries, including automotive component manufacturers, pipe and tube manufacturers and racking manufacturers.

Both BlueScope's locally produced galvanised steel and the imported products compete in all states and territories and across each segment through the same distribution channels. All customers have the opportunity to purchase imported material either direct from the overseas mill, through an international trader or from an Australian based stockist.

### **4.3.3 Alternative Products**

BlueScope stated that other coated steel products are substitutable for galvanised steel, including:

- 55% aluminium/zinc coated steel (also known as Aluzinc), 5% aluminium /zinc coated steel (also known as Galfan®) and zinc/magnesium coated steel (for certain product applications); and
- painted metallic coated steel substitutes (including painted versions of the products listed above).

Inter-materials are also substitutable for galvanised steel, depending on product end use, and include:

- timber, hot rolled structural sections, load bearing concrete panels and masonry for framing applications in construction;
- plastic and composite materials (i.e. conduits and ceiling and plaster fittings) for non-framing products for the building industry; and
- aluminium, plastics or advanced composites for automotive applications.

BlueScope claimed that, regardless of product substitutability, galvanised steel is considered by end-users to be better suited in the identified key applications 'due to its superior value proposition'.<sup>18</sup>

### **4.3.4 Market size**

#### **4.3.4.1 BlueScope's claims**

BlueScope claimed that the Australian market for galvanised steel is supplied, in addition to its own production, by imports from India, Taiwan, Vietnam, China, Korea and other countries.

BlueScope's application stated that Australian Bureau of Statistics (ABS) import data for galvanised steel (not containing alloys)<sup>19</sup> is the subject of country suppression orders and was therefore unavailable to BlueScope to assess market size. Instead, BlueScope has used monthly export and import volume data (in metric tonnes) sourced from the

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<sup>18</sup> Galvanised Steel Application, page 21.

<sup>19</sup> Classified to tariff subheadings 7210.49.00 (statistical codes 55, 56, 57 and 58) and 7212.30.00 (statistical code 61).

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International Steel Statistics Bureau (ISSB)<sup>20</sup> and the ABS, as well as its own sales data, to estimate the size of the Australian market for galvanised steel.

For India, BlueScope has obtained export data from ISSB, although it observed that data for 2013-14<sup>21</sup> was incomplete, due to the delay in publication of country of origin data. As a result, only data up to January 2014 was available. Therefore the Commission considers BlueScope's estimates of imports from India in 2013-14 to be understated.

As ISSB does not provide export data for Vietnam, BlueScope purchased aggregate annualised import data from the ABS for the 11 month period ending February 2014. The monthly data that is publicly available for import volumes from Vietnam (but does not cover the full range of statistical codes in this application) has been used to trend the (11 month) annualised number on a quarterly basis.

For galvanised steel (containing alloys), BlueScope has obtained import data from the ABS to determine the volumes of alloyed galvanised steel (with, for example, additions of boron) imported in 2013-14. BlueScope's application does not indicate that it intends to use this data for India and Vietnam.<sup>22</sup>

BlueScope has used this information to provide Australian market data (including domestic production and import volumes) on a monthly and quarterly basis from July 2008 to March 2014<sup>23</sup> in Confidential Appendix A2.<sup>24</sup>

### 4.3.4.2 The Commission's assessment

The Commission has compared the estimated import volumes in the application to the data in the ACBPS import database. The Commission filtered ACBPS data with reference to the tariff subheadings and statistical codes identified by BlueScope and outlined in Section 2.2.3 of this report.

The Commission found that total imports in the ACBPS database for India and Vietnam were similar to those estimated by BlueScope. The minor variances are likely due to BlueScope's use of incomplete data, i.e. data that was only available up to January 2014 for India and up to February 2014 for Vietnam.

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<sup>20</sup> The ISSB is a European agency that specialises in collecting, analysing and publishing import and export trade data. The company is involved in the publication of reports covering UK, European and global trade in steel and raw materials. Refer Galvanised Steel Application, page 45.

<sup>21</sup> All references in this report are, unless otherwise specified, references to an April-March year.

<sup>22</sup> The Commission has checked the ACBPS database and noted volumes for galvanised steel (containing alloys). On this basis, the Commission is not concerned that BlueScope does not intend to use data for India and Vietnam.

<sup>23</sup> BlueScope notes in Confidential Appendix A2 that March 2014 data is missing for Vietnam (ABS), South Korea – Boron (ABS) and Other – Alloy. However, it is also observed that data for February 2014 and March 2014 is missing for both India and Taiwan (galvanised steel not containing alloys); this has been confirmed by comparing the 2013-14 Australian market data with ISSB source data included in Confidential Appendix A2.

<sup>24</sup> A revised version of Confidential Appendix A2 was provided by BlueScope on 26 June 2014.

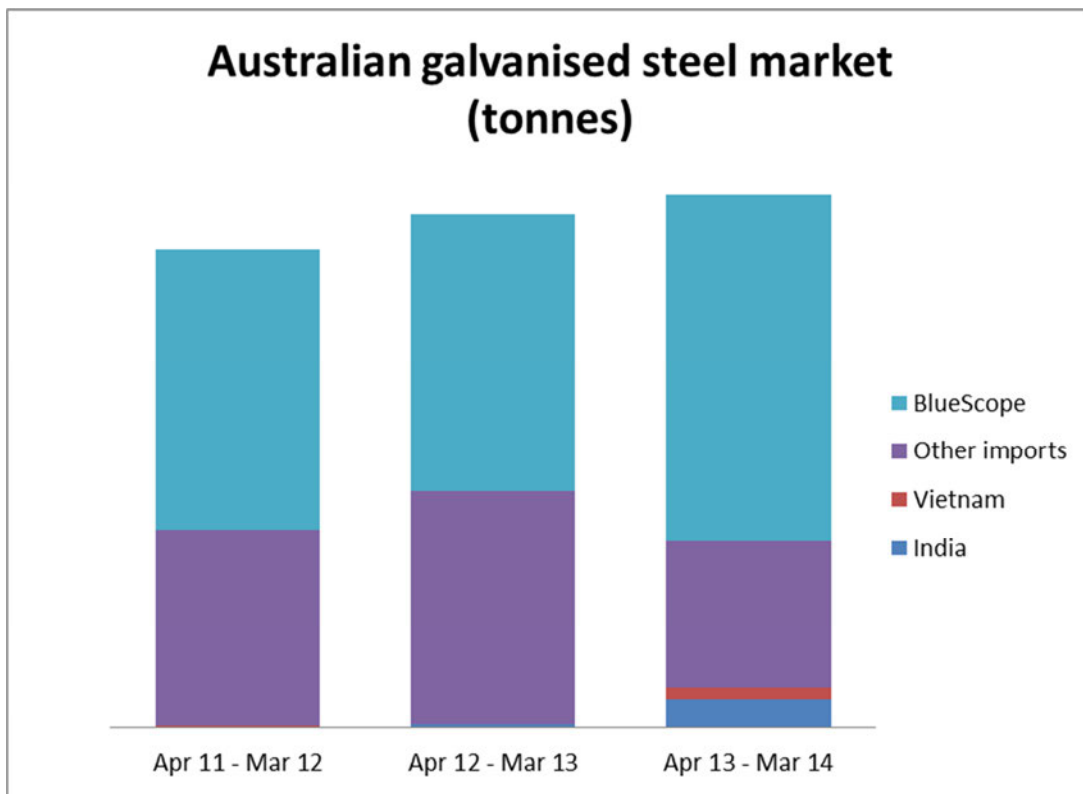
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The Commission found that product finishes (i.e. whether the galvanised steel is painted or unpainted) are not identifiable in the export data provided by BlueScope or in the ACBPS import data. As product finishes cannot be identified in the data used to estimate market volumes, it is likely that painted products which are outside the scope of the goods are included in import volumes of galvanised steel. The inclusion of these products may inflate import volumes and therefore the size of the Australian galvanised steel market.

Notwithstanding this concern, for the purposes of this report, the Commission considers that, in the absence of detailed import information, the data in the ACBPS import database provides a reasonable estimate of import volumes. During the course of the investigation, the Commission will seek detailed data from importers and exporters regarding key product specifications such as product finish to estimate a more accurate market size in respect of the goods.

The following graph depicts the Commission's estimate of the Australian market size for galvanised steel using data from the ACBPS import database and BlueScope's sales data.

The Commission estimates that in 2013-14 the size of the Australian market for galvanised steel appeared to be above 700,000 tonnes.



**Figure 1: Australian market for galvanised steel based on ACBPS and BlueScope sales data**

The graph above shows that the total Australian market size for galvanised steel has increased by around 11% since 2011-12.

## **4.4 Australian industry information**

### **4.4.1 General accounting / administration information**

BlueScope is a publicly listed company on the Australian stock exchange, limited by shares. BlueScope has a number of subsidiaries and joint ventures both in Australia and internationally. Several of these subsidiaries and joint ventures (such as BlueScope Distribution Pty Ltd) are directly involved in either the manufacture or supply of galvanised steel.

BlueScope has six internal corporate groups with distinct functions which operate in Australia and internationally. The application nominates the Coated & Industrial Products Australia group as being relevant to the goods the subject of the application.

The application states that BlueScope's financial accounting period is from 1 July to 30 June. BlueScope's audited financial statements and Annual Report for its 2012-13 financial accounting period were provided.<sup>25</sup> BlueScope provided its charts of accounts, internal management reports (for November 2013 and February 2014) and general accounting and administration information.

### **4.4.2 Australian industry sales information**

BlueScope provided sales volume and value information in the application, including a summary of domestic and export sales volumes, revenues and rebates, as required, in the relevant Confidential Appendices A2, A3, A5 and A6 for the period July 2007 to March 2014.<sup>26</sup> Confidential Appendices A1 (Australian production) and A4 (domestic sales) were also provided for the 2013-14 period.

The Commission examined the detail in, and link between, relevant appendices and identified some relatively minor discrepancies (i.e. variances of 1% to 3%) between Confidential Appendix A4 and Confidential Appendices A2, A3 and A6.1. As a result, BlueScope provided further information with an explanatory reconciliation of the appendices. This additional information highlighted that Confidential Appendix A4 included unadjusted cost and net revenue data to allow for reconciliation to source documents (i.e. sales invoices). The Commission is satisfied with BlueScope's explanation of the discrepancy between the relevant appendices.

The Commission therefore considers that BlueScope's appendices are suitable for the purposes of assessing the economic condition of the industry in respect of galvanised steel.

### **4.4.3 Cost information**

BlueScope completed Confidential Appendix A6 cost to make and sell (CTMS) for domestic (A6.1) and export (A6.2) sales of galvanised steel. The information provided in

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<sup>25</sup> The application notes that BlueScope's Annual Reports from 2003 are publicly available on its website at [www.bluescopesteel.com](http://www.bluescopesteel.com). Audited reports for 2013/14 will be available from mid-September 2014. Galvanised Steel Application, page 10.

<sup>26</sup> NB Confidential Appendix A6.1 is from April 2007.

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these appendices included production and sales volumes, manufacturing costs, selling, general and administrative (SG&A) expenses (including distribution costs) for the period 2007-08 to 2013-14.

As BlueScope manufacture and supply a wide range of galvanised steel products at varying widths and thickness, the company also provided disaggregated data for different widths (less than 600mm, and equal to or greater than 600mm), as well as for key product specifications, representing products with the highest sales volumes. The Commission noted that the sum of the data for these three products (as well as a fourth category called 'other') reconciled with the total for galvanised steel (subject to a few minor discrepancies).

Notwithstanding these minor discrepancies, the Commission examined the information provided and the link between the appendices and considers the information suitable for the purposes of assessing the economic condition of the industry in respect of galvanised steel.

### **4.4.4 Other economic factors**

BlueScope completed Confidential Appendix A7 for the period 1 July 2008 to 31 December 2013 (based on its standard July-June financial year) showing movements in assets, capital investment, research and development expenses, revenue, return on investment, capacity, capacity utilisation, employment, productivity and wages.

### **4.4.5 The Commission's assessment**

Based on the information in the application, the Commission is satisfied that there is an Australian industry producing like goods to the goods the subject of the application and that the information contained in the application is sufficient for the purposes of a preliminary analysis of the economic condition of the industry in respect of galvanised steel from 2007-08 to 2013-14.

## **5 REASONABLE GROUNDS – DUMPING**

### **5.1 Findings**

Having regard to the matters contained in the application, and to other information considered relevant, there appear to be reasonable grounds to support the claims that:

- galvanised steel has been exported to Australia from India and Vietnam at dumped prices (refer Section 5.6);
- the individual total volumes of galvanised steel that appear to have been dumped from India and Vietnam are both greater than 3% of the total Australian import volume of the goods, and are therefore not negligible (refer Section 5.5); and
- the estimated dumping margins for India and Vietnam are both greater than 2% and are therefore not negligible (refer Section 5.6).

### **5.2 Legislative framework**

Article 5.2 of the World Trade Organisation Anti-Dumping Agreement (AD Agreement) states that an application shall include evidence of dumping. The AD Agreement states that simple assertion, unsubstantiated by relevant evidence, cannot be considered sufficient to meet this requirement, but such information must be reasonably available to the applicant.

Subsection 269TC(1) requires that the Commissioner must reject an application for a dumping duty notice if, inter alia, the Commissioner is not satisfied that there appear to be reasonable grounds for the publication of a dumping duty notice.

Under section 269TG, one of the matters that the Minister must be satisfied of to publish a dumping duty notice is that the export price of goods that have been exported to Australia is less than the normal value of those goods. This issue is considered in the following sections.

### **5.3 Export price**

#### **5.3.1 BlueScope's claims**

##### **5.3.1.1 India**

As discussed in Section 4.3.4, BlueScope claimed that ABS import data for galvanised steel (not containing alloys)<sup>27</sup> is the subject of country suppression orders. As a result, BlueScope has relied on monthly export volumes and values sourced from ISSB to calculate an export price for India. As ISSB data contains information based on exports, BlueScope noted that there may be slight volume discrepancies between the ACBPS import data and the ISSB export data, due to timing differences.

BlueScope stated that the terms of the ISSB export prices were free-on-board (FOB).

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<sup>27</sup> Classified to tariff subheadings 7210.49.00 (statistical codes 55, 56, 57 and 58) and 7212.30.00 (statistical code 61).

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BlueScope has calculated bi-monthly FOB export prices and volumes for galvanised steel exported to Australia from India in 2013-14. These bi-monthly export prices (AUD/metric tonne) have been calculated by averaging the ISSB derived unit prices for the two relevant months. BlueScope also calculated a weighted average FOB per tonne price for 2013-14 of AUD864.99 (this does not include data for February/March 2014).

### 5.3.1.2 Vietnam

For exports from Vietnam, BlueScope has used the aggregate cost insurance and freight (CIF) import data that it purchased from the ABS for the 11 months ending February 2014. BlueScope calculated a weighted average FOB price (AUD/metric tonne) of AUD893.38 (this does not include data for March 2014). To derive a FOB value, BlueScope has calculated an overseas insurance and freight value for steel products exported to Australia from Vietnam from available monthly ABS data and deducted it from the CIF value.

### 5.3.2 The Commission's assessment

To verify the reliability of the export data provided by BlueScope, the Commission has compared the weighted average export prices provided in the application with weighted average export prices calculated using data contained in the ACBPS import database. Based on this comparison, the Commission found there were only minor variances between BlueScope's calculations and the calculations undertaken by the Commission. The Commission's recalculated export prices are provided at **Confidential Attachment CA 1**.

The Commission considers that, based on the information submitted in the application, the amounts used by BlueScope to estimate FOB export prices for galvanised steel exported to Australia from the nominated countries appear to be reasonable.

## 5.4 Normal values

BlueScope has calculated normal values for India and Vietnam using domestic selling price information under subsection 269TAC(1). Both of these normal values have been calculated for 2013-14.

BlueScope claimed that the full range of product specifications the subject of this application in respect of galvanised steel is not commonly sold in India or Vietnam. In addition, BlueScope claimed that published domestic prices for galvanised steel products are not readily available from reliable third parties, industry journals or steel industry publications.

### 5.4.1 BlueScope's claims

BlueScope has obtained domestic selling price information from confidential sources in India and Vietnam.<sup>28</sup> It has used this information to calculate normal values that include an adjustment for thickness of steel (discussed further in Section 5.4.3.1 of this report).

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<sup>28</sup> The Commission has considered the claim of confidentiality in relation to this data (per Galvanised Steel Application, page 48) and accepts it.

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### 5.4.1.1 India

For goods sold domestically in India, BlueScope has calculated normal values on a bi-monthly basis. In undertaking this calculation, BlueScope has separated its selling price data into three groups, based on relative thickness. This has allowed BlueScope to apply a separate adjustment to each group, based on the additional zinc cost each would require (Section 5.4.3.1 refers). The values identified in the table below are an average of the three product groups for that period. BlueScope also calculated a weighted average normal value for 2013-14 using ISSB export volumes.

Apr/May 2013	Jun/Jul 2013	Aug/Sept 2013	Oct/Nov 2013	Dec 2013/ Jan 2014	Feb/Mar 2014	Total 2013-14
954.83	942.08	944.18	967.92	1,031.14	1,013.92 *	<b>979.41</b>

\* NB ISSB data provided a zero volume for this period.

**Figure 2: bi-monthly domestic selling prices (AUD/metric tonne) for India**

### 5.4.1.2 Vietnam

For Vietnam, BlueScope has calculated normal values on a monthly basis using the domestic selling price information it obtained. The majority of the data related to products of one particular thickness. In instances where more than one price was obtained for a given month, BlueScope has taken the lowest price per tonne for that period, before applying an adjustment for thickness (Section 5.4.3.1 refers). BlueScope also calculated a weighted average normal value for 2013-14 using the volumes derived from its domestic price data.

	Selling Price AUD/MT
April 2013	935
May 2013	-
June 2013	-
July 2013	978
Aug 2013	1067
Sep 2013	-
Oct 2013	1028
Nov 2013	1037
Dec 2013	1073
Jan 2014	1088
Feb 2014	-
Mar 2014	1050
<b>Total 2013-14</b>	<b>1038.66</b>

**Figure 3: monthly domestic selling prices for Vietnam (incl adjustment) (2013-14)**



## **5.4.2 The Commission's assessment**

The Commission has considered BlueScope's normal value calculations for India and Vietnam and is satisfied that BlueScope has supported its estimates with information that is reasonably available.

Although BlueScope used slightly different methodologies in each case, the Commission considers that these are reasonable in the circumstances and reflect the relative differences in the data (particularly in relation to product thickness). Therefore, based on the information submitted in the application, BlueScope's estimates of normal values for galvanised steel sold in India and Vietnam appear to be reasonable.

The Commission notes that the normal value calculations are on an ex-factory basis, and an upward adjustment is required to account for inland freight, consistent with the relevant inclusion of this cost in the FOB export price (Section 5.4.3.2 refers).

## **5.4.3 Adjustments**

### **5.4.3.1 Steel thickness**

BlueScope stated that domestic selling prices in India and Vietnam are generally for heavy gauge (or thick) galvanised steel, compared to the primarily light gauge (or thin) product that is exported to Australia. Therefore, to enable a fair comparison between domestic and export prices, BlueScope has uplifted the normal value to account for the additional cost associated with coating thinner gauge product.

BlueScope obtained coating cost information from its confidential sources in India and Vietnam<sup>29</sup> and, as appropriate, adjusted the purchase prices of heavier thickness galvanised steel to equate to the thin gauge steel exported to Australia.

The Commission is not in a position to comment on the accuracy of statements made by BlueScope in relation to the particular thickness of goods primarily exported to Australia from the countries named in the application, and no evidence has been provided by BlueScope to support these claims. However, it is noted from the domestic selling price information provided in relation to India and Vietnam that the goods within that data are of a heavier thickness than that claimed to be exported to Australia. Further discussion regarding the potential impact that this adjustment has on dumping margins is outlined at Section 5.6.

### **5.4.3.2 Inland freight**

BlueScope stated that the normal values for galvanised steel sold in India and Vietnam have been determined at the ex-factory level, while export prices sourced from ISSB and ABS data are at the FOB level. It stated that FOB export prices are therefore likely to include domestic inland freight in the country of export. BlueScope claims that it does not have access to inland freight charges from the manufacturer in the exporting countries to place of export. It considers that normal values need to be adjusted upwards to take

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<sup>29</sup> The Commission has considered the claim of confidentiality in relation to this data (per Galvanised Steel Application, page 51) and accepts it.

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account of the inland freight and ensure comparability of normal values and export prices. However, in the absence of actual inland freight charges, BlueScope has not adjusted normal values.

Although the normal value calculations submitted by BlueScope do not include an adjustment for inland freight, the Commission does not consider this to be a material concern at the consideration stage. Rather, in not making this upward adjustment, BlueScope has understated its dumping margins for each country. During the course of the investigation, the Commission will seek detailed data from exporters regarding domestic inland freight costs in the country of export.

### 5.5 Import volumes

From the information available from the ACBPS import database, it appears that imports of galvanised steel from India and Vietnam (classified to the tariff subheadings specified at Section 2.2.3) each represented more than 3% of the total import volume of galvanised steel during 2013-14 and are therefore not in negligible volumes as defined in section 269TDA.

It is noted that the proportion of imports from the nominated countries were found by the Commission to be marginally higher than BlueScope's estimates. This is likely because BlueScope's data for India and Vietnam (sourced from ISSB and the ABS respectively) was incomplete, i.e. was only available up to January 2014 for India and up to February 2014 for Vietnam.

### 5.6 Dumping margins

Dumping margins for galvanised steel calculated by BlueScope and provided in its application are summarised in the following table:

Country	Dumping Margin
India	13.23%
Vietnam	16.26%

Figure 4: BlueScope's Dumping Margins (2013-14)

The Commission revised these dumping margins for 2013-14 using ACBPS data for export prices and BlueScope's submitted normal values. It found that the results were relatively consistent.

Export prices (based on the ACBPS database) and revised dumping margin calculations for galvanised steel are **Confidential Attachments CA 1 and CA 2** respectively.

The Commission also reviewed BlueScope's methodology for calculating the dumping margins, including the adjustment for thickness of steel. In assessing the risk associated with data submitted by BlueScope, the Commission has removed the adjustment from the normal value calculations and found that it has reduced the revised dumping margins for India and Vietnam by between 8% and 9% (compared to BlueScope's estimates).

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Revised dumping margin calculations (using ACBPS export prices and removing the adjustment for thickness) are at **Confidential Attachment CA 3**.

### **5.6.1 The Commission's assessment**

The Commission is satisfied that, based on the information submitted in the application in respect of galvanised steel, BlueScope has demonstrated that there appear to be reasonable grounds for concluding that galvanised steel has been exported to Australia from India and Vietnam at dumped prices.

## 6 REASONABLE GROUNDS – ECONOMIC CONDITION OF THE INDUSTRY

### 6.1 Findings

Having regard to the information contained in the application, and to other information considered relevant, the Commission is satisfied that the Australian industry appears to have experienced injury in terms of:

- price suppression;
- reduced profit and profitability;
- reduced return on investment; and
- reduced employment numbers.

### 6.2 Legislative framework

Subsection 269TC(1) requires that the Commissioner must reject an application for a dumping duty notice if, inter alia, he is not satisfied that there appear to be reasonable grounds for the publication of a dumping duty notice.

Under sections 269TG and 269TJ, one of the matters that the relevant Parliamentary Secretary<sup>30</sup> must be satisfied of to publish a dumping duty notice is that, because of dumping of the goods, material injury has been or is being caused or is threatened to the Australian industry producing like goods.

### 6.3 Approach to injury analysis

The injury analysis detailed in this section is based on information provided by BlueScope in its application, including:

- BlueScope's production, costs and sales data;
- ABS import and ISSB export data; and
- data obtained from the ACBPS import database, where relevant.

BlueScope provided production, cost and sales data on a quarterly basis for the period 1 April 2007 to 31 March 2014. To facilitate annual analysis, it grouped the data into years commencing 1 April and ending 31 March.

As BlueScope manufacture and supply a wide range of galvanised steel products at varying widths and thickness, production, cost and sales data was also disaggregated and provided for different widths (less than 600mm, and equal to or greater than 600mm), as well as for key product specifications, representing products with the highest sales volumes.

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<sup>30</sup> Responsibility for anti-dumping matters was transferred to the Minister for Industry on 25 September 2013. The Minister for Industry subsequently delegated responsibility for anti-dumping matters to the Parliamentary Secretary to the Minister for Industry.

At the consideration stage, aggregate data has been used for the purpose of assessing material injury to the Australian industry. Micro-analysis covering individual or a range of product specifications may be undertaken during the investigation.

## **6.4 Cumulation of injury**

Subsection 269TAE(2C) provides for consideration of the cumulative effect of exports from different countries, if, after having regard to:

- the conditions of competition between the exported goods; and
- the conditions of competition between the exported goods and the like goods that are domestically produced;

the Parliamentary Secretary<sup>31</sup> is satisfied that it is appropriate to do so.

Based on the information provided in the application, the Commission is satisfied that in respect of galvanised steel the conditions of competition between imported and domestically produced like goods appear to be similar.

The information contained in the ACBPS import database indicates that in 2013-14 several importers of galvanised steel imported from either or both of the nominated countries. The Commission considers that this indicates that the products are used by the same or similar customers.

As discussed at Section 4, the Commission is satisfied that the goods are alike, have the same essential characteristics, have similar end-uses and compete in the same primary market segments.

The Commission therefore considers that it is appropriate to consider the cumulative effect of the allegedly dumped imports from India and Vietnam, as:

- the margin of dumping for each country is not negligible;
- the volume of imports from each country is not negligible; and
- the cumulative assessment is appropriate in light of the conditions of competition between the imported goods and the like domestic goods.

## **6.5 The applicant's injury claims<sup>32</sup>**

In respect of galvanised steel, BlueScope claimed that the Australian industry has been injured through:

- price suppression;
- reduced profit and profitability;
- reduced return on investment;
- reduced employment numbers; and

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<sup>31</sup> Responsibility for anti-dumping matters was transferred to the Minister for Industry on 25 September 2013. The Minister for Industry subsequently delegated responsibility for anti-dumping matters to the Parliamentary Secretary to the Minister for Industry.

<sup>32</sup> Section 2.1 also refers.

- reduced ability to raise capital for re-investment.

## 6.6 Commencement of injury

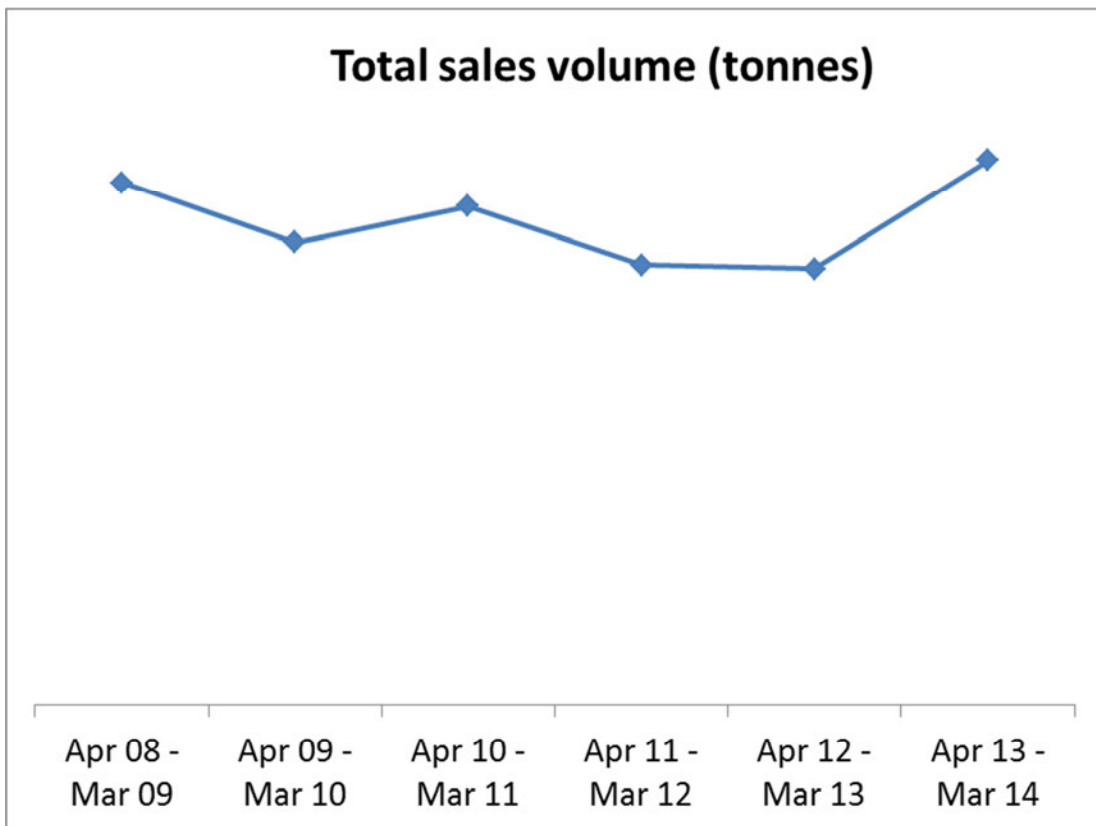
BlueScope's application stated that REP 190 found the Australian industry had suffered material injury in the 2011-12 financial year from dumped and subsidised exports of galvanised steel (not containing alloys) from China, Korea and Taiwan. Following the imposition of measures, BlueScope claimed that dumped exports of galvanised steel from India and Vietnam emerged (relative to negligible volumes observed in 2011-12). It is BlueScope's position that injury from dumped exports from India and Vietnam has displaced the injurious exports from China, Korea and Taiwan, resulting in a continuation of material injury to the Australian industry in 2013-14

## 6.7 Volume effects

### (i) Sales volume

BlueScope has not claimed that the Australian industry suffered material injury in relation to sales volume or market share. Rather, BlueScope stated that it has experienced increased production, sales volume and market share in 2013-14, albeit by reducing its unit prices.

The following graph shows BlueScope's total sales volumes for galvanised steel in the Australian market since April 2008.



**Figure 5: Domestic sales volume of galvanised steel**

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This graph shows that BlueScope's domestic sales volumes of galvanised steel has noticeably increased in 2013-14 and appears to be at a similar level to 2008-09.

(ii) Market share

The following graph shows changes in market share between BlueScope and importing countries based on ISSB and ABS data provided in BlueScope's application.

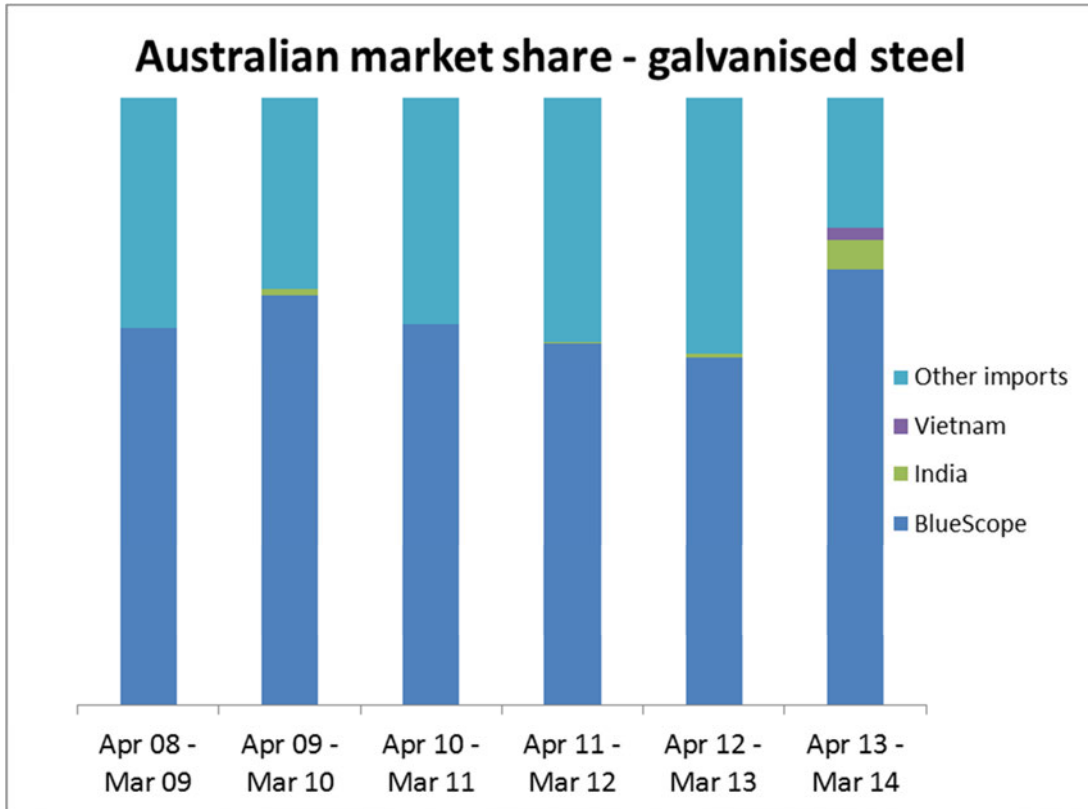


Figure 6: Australian market share based on ISSB, ABS and BlueScope sales data

The above graph shows that BlueScope's share in the Australian galvanised steel market noticeably increased in 2013-14, after having decreased progressively since 2009-10.<sup>33</sup> The graph also shows that there was a considerable increase in the market share of imports from India and Vietnam in 2013-14.

### 6.7.1 Conclusion – volume effects

Based on this analysis, and consistent with BlueScope's assessment, the Commission considers that there is no evidence of injury to the Australian industry in the form of loss of sales volume or market share.

## 6.8 Price effects

BlueScope claimed that the Australian industry has suffered material injury in the form of price suppression. It alleges that the price suppression experienced by the Australian

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<sup>33</sup> The latter observation is consistent with REP 190.

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industry has been due to dumped exports undercutting the Australian industry selling prices.

In particular, BlueScope claimed that its unit CTMS for galvanised steel has declined by approximately 3.5% since 2011-12, while the unit price declined by more than 6% over the same period. BlueScope contends that it has been unable to raise prices in order to recover lost margins due to price undercutting from dumped imports of galvanised steel (not covered by measures) from India and Vietnam.

Price suppression occurs when price increases, which otherwise would have occurred, have been prevented. An indicator of price suppression may be the margin between revenues and costs.

The following graph shows the trends in BlueScope's unit revenue and unit CTMS for galvanised steel from 2008-09 to 2013-14.

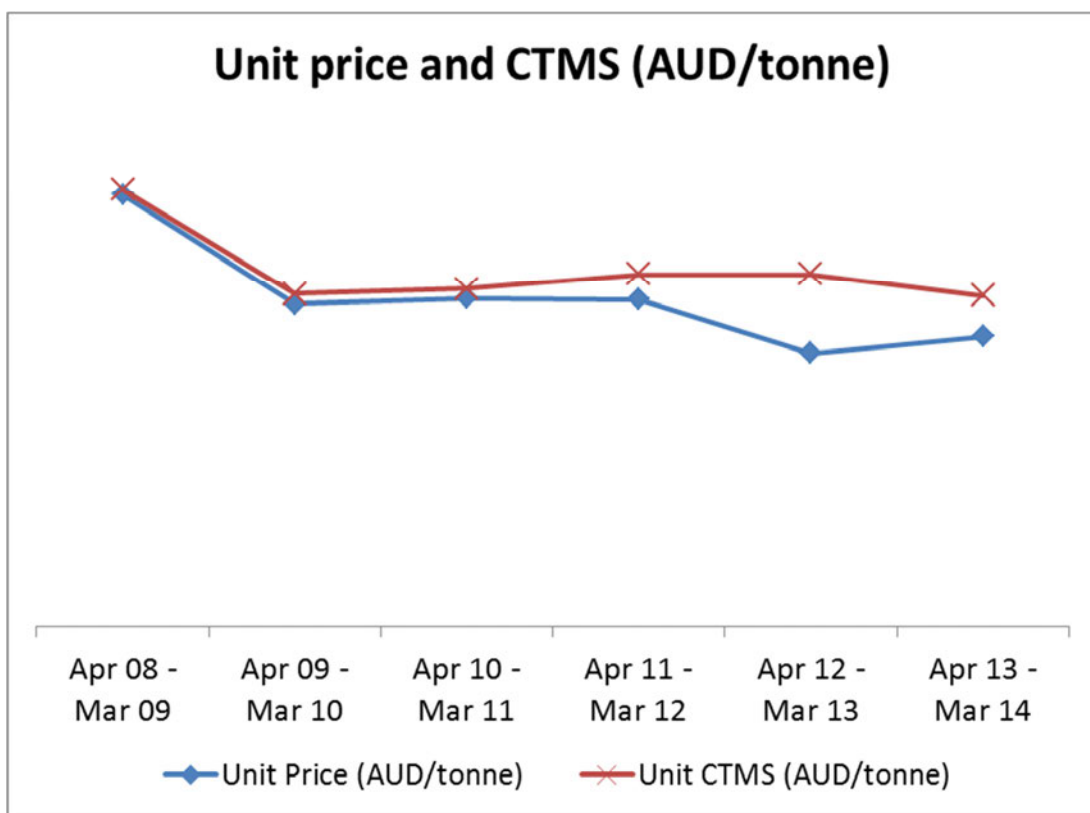


Figure 7: BlueScope's galvanised steel unit price and cost

The graph above shows that since 2011-12, BlueScope's unit price has significantly decreased relative to unit cost and there is a notable margin between the two. Although the unit CTMS has decreased slightly in 2013-14 and the unit price has increased slightly, unit price still remains below unit cost, indicating price suppression.

### 6.8.1 Conclusion – price effects

Based on this analysis, there appears to be reasonable grounds to support the claim that the Australian industry has experienced injury in the form of price suppression.



## 6.9 Profit and profitability effects

BlueScope claimed that as a consequence of price suppression in 2012-13 and 2013-14, the Australian industry’s profit and profitability declined and in 2013-14 remained below the profit and profitability achieved in 2011-12. BlueScope claimed that dumped imports from India and Vietnam have undercut the Australian industry’s selling prices, resulting in price suppression and therefore reduced profit and profitability.

The following graph shows trends in BlueScope’s profit and profitability<sup>34</sup> from 2008-09 to 2013-14.

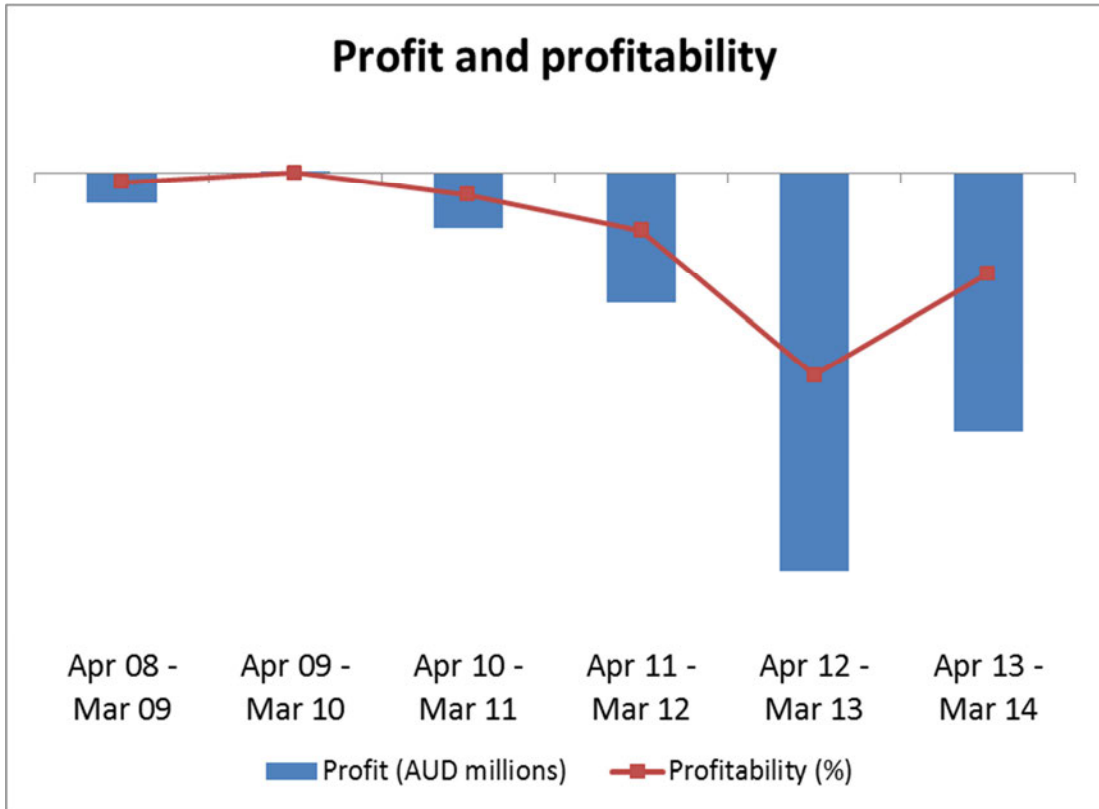


Figure 8: BlueScope’s total profit and profitability for galvanised steel

The graph above shows a continuing (and considerable) decrease in BlueScope’s profit and profitability since 2009-10, particularly in 2012-13. Although profit and profitability noticeably improved in 2013-14 (relative to 2012-13), BlueScope has still made a considerable loss in that year and at a level below 2011-12.

### 6.9.1 Conclusion – profit and profitability effects

Based on this analysis, there appears to be reasonable grounds to support the claim that the Australian industry has suffered injury in the form of reduced profit and profitability.

<sup>34</sup> As a percentage of sales revenue.

## **6.10 Other economic factors**

### **6.10.1 BlueScope's claims**

BlueScope completed Confidential Appendix A7 (other injury factors) for the period 1 July 2008 to 31 December 2013 (based on its standard July-June financial year).

BlueScope claimed that the Australian industry has experienced injury in respect of other economic/injury factors (Section 2.1 refers), including reduced return on investment, reduced employment numbers and reduced ability to raise capital for re-investment.

### **6.10.2 The Commission's assessment**

The information provided by BlueScope in Confidential Appendix A7 has been reviewed and identified the following trends:

- assets – the Commission identified a downward trend in the value of assets used in the production of galvanised steel since the 2008-09 financial year;
- return on investment – return on investment in relation to galvanised steel decreased between 2009-10 to 2012-13. Although there has been an improvement in the first half of 2013-14, it remains a negative return; and
- employment – employment relating to galvanised steel production (measured in number of persons) decreased overall between 2008-09 and 2012-13. Although there was a slight improvement in the first half of 2013-14, this remains at a level below that in 2011-12.

Based on the information contained in Appendix A7 relating specifically to galvanised steel, it appears there are reasonable grounds to conclude BlueScope has experienced injury in the form of reduced return on investment and reduced employment numbers. In relation to the claim that BlueScope has experienced a reduced ability to raise capital for re-investment, the Commission notes that BlueScope has not submitted any evidence of this in the application.

As BlueScope had only provided data for the first half of financial year 2013-14, the Commission cannot accurately assess whether BlueScope had experienced the abovementioned injury factors over the entire year (other than extrapolating data for the first half of 2013-14 out to the second half). Notwithstanding, this does not diminish the assertions made by BlueScope in relation to the injury it has suffered. These injury factors will be further examined at the verification visit during the course of the investigation.

## 7 REASONABLE GROUNDS – CAUSATION FACTORS

### 7.1 Findings

Having regard to the matters contained in the application, the Commission is satisfied that the goods under consideration exported to Australia from India and Vietnam at allegedly dumped prices appear to have caused material injury to the Australian industry.

### 7.2 BlueScope's claims

BlueScope's application claimed that in 2013-14 the Australian industry recovered some of its lost sales volumes and market share, following the imposition of measures in relation to galvanised steel (not containing alloys) from China, Korea and Taiwan. However, the sales recovered have been at reduced margins, contributing to a further deterioration in profit and profitability compared to that in 2011-12.

BlueScope stated that exports of galvanised steel from India and Vietnam have emerged above negligible levels in 2013-14 and have undercut the Australian industry's selling prices.

As evidence of price undercutting, the application contained six specific examples of commercial negotiations between BlueScope and its Australian customers (including manufacturers and distributors).<sup>35</sup> These examples were supported by documentation (in some cases email correspondence between BlueScope and its customers or targeted customers, in others internal correspondence between BlueScope employees).

BlueScope submitted that these examples demonstrated BlueScope had reduced its selling price to secure the volumes or, as advised by the customer, had lost the sale.

BlueScope also provided a summary of import offers (prices shown in AUD per metric tonne and at free-in-store) from both of the nominated countries, at prices that BlueScope claimed undercut its own selling prices. Source documentation to substantiate a selected number of import sales offers was included in the application.

### 7.3 The Commission's assessment

The Commission considers that the information provided in BlueScope's application represents reasonable and positive evidence to support its claim that the prices of goods imported from India and Vietnam, when sold in Australia, have been undercutting BlueScope's prices.

In undertaking this assessment, the Commission compared Australian selling prices of the imported goods (as outlined in the summary of import offers provided by BlueScope) to monthly weighted average prices for BlueScope in 2013-14. The Commission found that all import offers were below the corresponding monthly prices for BlueScope. The amount by which the import offers were less than the monthly BlueScope prices ranged from approximately 1% to 15%.

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<sup>35</sup> Galvanised Steel Application, pages 35-7.

## **PUBLIC RECORD**

Based on this, the Commission considers it is reasonable to conclude that the alleged dumping appears to have contributed to the competitiveness of importer prices when competing with BlueScope in the Australian market. Accordingly, it is reasonable to conclude that the dumping appears to have contributed to the ability of importers to undercut BlueScope's prices, and to exert price pressures on BlueScope more generally.

Further support for this conclusion is evident in the Commission's analysis of the BlueScope pricing strategy that is based around import parity pricing (IPP). The evidence submitted by BlueScope indicates the IPP is a genuine consideration for BlueScope in negotiating and finalising its prices.

The Commission also considers it is reasonable to conclude that the price pressures caused by dumping appear to have prevented BlueScope from increasing its prices by any significant degree to improve the proportion of revenue to CTMS, which represents price suppression.

Notwithstanding the finding that BlueScope does not appear to have experienced injury in the form of lost sales or market share, the Commission considers that the price suppression caused by dumping has resulted in significant reductions to BlueScope's profits and profitability.

The Commission considers that the degree of price and profit injury experienced by BlueScope, and that appears to have been caused by dumping, is material.

### **7.4 Factors other than dumping**

BlueScope claimed that depreciation of the Australian dollar during 2013-14, as well as the imposition of provisional anti-dumping measures on imported galvanised steel (not containing alloys) in February 2013, should have resulted in a shift away from imported goods. However, BlueScope stated this has not been evident, due to the emergence of dumped galvanised steel exported from India and Vietnam. BlueScope stated that it remains ready to supply increased demand in Australia and considers that the only material factor adversely impacting the Australian industry is the dumped exports of galvanised steel from India and Vietnam.

The impact of factors other than dumping that may have caused material injury to the Australian industry will be considered further during the investigation.

### **7.5 Comparison of export price and non-injurious price**

To further assess whether the alleged dumping from the nominated countries caused injury to the Australian industry, the Commission has compared export prices from India and Vietnam to an estimated non-injurious price (NIP) for 2013-14.

The NIP is the minimum price necessary to prevent injury to the Australian industry producing like goods. If export prices are greater than the NIP, it would suggest that dumping may not be causing material injury. If, on the other hand, export prices are lower than the NIP, this would support a finding that dumped imports have caused material injury to the Australian industry producing like goods.

## PUBLIC RECORD

BlueScope did not provide unsuppressed selling price (USP) or NIP estimates in its application. However, it is considered appropriate to compare the allegedly dumped export prices to NIP estimates for the purposes of this report.

The Commission considered calculating the NIP using a USP based on the industry's selling prices in 2012-13. However, this approach was considered inappropriate given the Australian industry was already experiencing injury from the dumping of galvanised steel (not containing alloys) from China, Korea and Taiwan, as well as the alleged quantum of the dumped goods discussed in this report. The Commission therefore considered that it is most reasonable to derive a USP by relying on the Australian industry's current CTMS plus a profit margin, where appropriate.

Consequently, the Commission calculated a USP for the Australian industry in 2013-14 using BlueScope's weighted average CTMS for all galvanised steel products. As the Australian industry has been making losses on each tonne sold since 2010-11, the Commission did not add a profit margin to the industry's unit cost to derive a USP. While this is a conservative assumption, in the absence of dumped imports, it is reasonable to expect that the Australian industry would, in a market unaffected by dumping, be able to recover all its costs for each tonne sold.

The Commission then deducted amounts from the USP for a reasonable estimate of post-exportation costs including overseas freight, insurance, landing and clearing charges and importer SG&A and profit. These estimates were derived from data verified previously for the purposes of REP 190. These calculations provided a NIP at an FOB level, which is suitable for comparison to an FOB export price.

The Commission compared its NIP with the weighted average export prices for India and Vietnam in 2013-14. This comparison found that weighted average export prices for India and Vietnam were all significantly below the NIP.

This further supports the position that allegedly dumped imports have caused material injury to the Australian industry.

Calculations of the USP and NIP, and a comparison with the FOB export price, are at **Confidential Appendix CA 1**.

### **7.6 Conclusion on whether dumped imports caused material injury to the Australian industry**

The Commission is satisfied that based on the information contained in the application, ACBPS data and the preliminary analysis detailed above, BlueScope has demonstrated that the Australian industry appears to have suffered material injury in respect of galvanised steel in the form of:

- price suppression;
- reduced profit and profitability;
- reduced return on investment; and
- reduced employment numbers.

## 8 CONCLUSION

The Commissioner has examined the application and is satisfied that:

- the application complies with subsection 269TB(4); and
- there is an Australian industry in respect of like goods; and
- there appear to be reasonable grounds for the publication of dumping duty notice in respect of the goods the subject of the application.

Accordingly, the Commissioner has not rejected the application for the publication of a dumping duty notice under subsection 269TB(1).

For the purposes of the investigation:

- the investigation period to determine whether dumping has occurred will be from **1 July 2013 to 30 June 2014**; and
- the Commissioner will examine the Australian market and the economic condition of the industry **from 1 July 2008** for the purposes of injury analysis.

**9 APPENDICES AND ATTACHMENTS**

<b>Appendix 1</b>	Public notice
<b>Attachment A1</b>	Table of TCOs applicable to tariff subheadings
<b>Attachment A2</b>	Table of exemptions that currently apply to existing anti-dumping measures on galvanised steel
<b>Confidential Attachment CA 1</b>	Export prices (based on ACBPS data) and NIP calculations
<b>Confidential Attachment CA 2</b>	The Commission's Dumping Margin calculations
<b>Confidential Attachment CA 3</b>	The Commission's Dumping Margin calculations (without normal value adjustments for thickness)



*Customs Act 1901 – Part XVB*

**Zinc Coated (Galvanised) Steel**

**Exported from India and the Socialist Republic of Vietnam**

**Initiation of an Investigation into Alleged Dumping**

*Public notice under section 269TC of the Customs Act 1901*

I, Dale Seymour, the Commissioner of the Anti-Dumping Commission (the Commission), have initiated an investigation following an application lodged by BlueScope Steel Limited, a manufacturer of zinc coated (galvanised) steel in Australia. The application seeks the publication of a dumping duty notice in respect of certain galvanised steel exported to Australia from India and the Socialist Republic of Vietnam (Vietnam).

The goods the subject of the application (“the goods”) are flat rolled iron or steel products (whether or not containing alloys) that are plated or coated with zinc exported to Australia from India and Vietnam.

The goods are generically called galvanised steel. Galvanised steel of any width is included in this application.

A full description of the goods is available in Anti-Dumping Notice (ADN) No. 2014/55. This ADN is available on the internet at [www.adcommission.gov.au](http://www.adcommission.gov.au).

The goods are currently classified to the tariff subheadings 7210.49.00 (statistical codes 55, 56, 57 and 58), 7212.30.00 (statistical code 61), 7225.92.00 (statistical code 38) and 7226.99.00 (statistical code 71) of Schedule 3 to the *Customs Tariff Act 1995*. Goods from India and Vietnam, classified to tariff subheadings 7210.49.00 and 7212.30.00, are duty free, while goods classified to tariff subheadings 7225.92.00 and 7226.99.00 are subject to 4 per cent Customs duty.

The application alleges that the goods have been exported to Australia at prices less than their normal value and that the dumping has caused material injury to the Australian industry through price suppression, reduced profit and profitability, reduced return on investment, reduced employment numbers and reduced ability to raise capital for re-investment.

The non-confidential version of the application, which contains the basis of the alleged dumping, is available on the public record.

The goods exported to Australia during the period 1 July 2013 to 30 June 2014 will be examined to determine whether dumping has occurred. The Australian market will be examined from 1 July 2008 for injury analysis purposes.



Where there are grounds for the Parliamentary Secretary to the Minister for Industry to publish a dumping duty notice in respect of the goods, the Commission will examine whether the trade in the dumped goods give rise to retrospective notices being published pursuant to section 269TN of the Act, and make recommendations to the Parliamentary Secretary accordingly.

The date of initiation of this investigation is the date of publication of this notice.

Interested parties, as defined by subsection 269T(1) of the Act, are invited to lodge submissions concerning the publication of the dumping duty notice sought in the application, no later than the close of business on **20 August 2014**, addressed to:

The Director  
Operations 1  
Anti-Dumping Commission  
Customs House  
1010 La Trobe Street  
Docklands VIC 3008

or by email [operations1@adcommission.gov.au](mailto:operations1@adcommission.gov.au), or by fax to 1300 882 506.

ADN 2014/55, containing important procedural details is available at [www.adcommission.gov.au](http://www.adcommission.gov.au) and should be read in conjunction with this notice.

Particulars of the reasons for the decision to initiate this investigation are shown in *Anti-Dumping Commission Consideration Report No. 249*, which has been placed on the public record.

Documents included on the public record are available at [www.adcommission.gov.au](http://www.adcommission.gov.au). Alternatively, the public record may be examined at the Commission's office by contacting the case manager on the details provided below.

Enquiries about this notice may be directed to the case manager on telephone number +61 3 9244 8562, fax number 1300 882 506 or +61 2 6275 6888 (outside Australia) or [operations1@adcommission.gov.au](mailto:operations1@adcommission.gov.au).

Dale Seymour  
Commissioner  
Anti-Dumping Commission

11 July 2014

TCOs applicable to 7210.49.00	
TC 1404843	<p>COILS, non-alloy steel, flat-rolled, hot dipped galvanized zinc coated, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 195 MPa;</li> <li>(b) tensile strength NOT less than 340 MPa;</li> <li>(c) elongation NOT less than 34%;</li> <li>(d) coating mass NOT less than 30 g/m<sup>2</sup> on each side;</li> <li>(e) thickness 0.70 mm AND width 1 565 mm.</li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e) are as follows:</p> <ul style="list-style-type: none"> <li>(i) thickness +/- 10%;</li> <li>(ii) width +/- 1%.</li> </ul>
TC 1404844	<p>COILS, non-alloy steel, flat-rolled, hot dipped zinc coated, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 240 MPa and NOT greater than 300 MPa;</li> <li>(b) tensile strength NOT less than 340 MPa;</li> <li>(c) elongation NOT less than 34%;</li> <li>(d) coating mass NOT less than 50 g/m<sup>2</sup> and NOT greater than 80 g/m<sup>2</sup> on each side;</li> <li>(e) thickness 0.65 mm AND width 1 475 mm.</li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e) are as follows:</p> <ul style="list-style-type: none"> <li>(i) thickness +/- 10%;</li> <li>(ii) width +/- 1%.</li> </ul>
TC 1341633	<p>STEEL, flat rolled, non-alloy, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 160 MPa and NOT greater than 325 MPa;</li> <li>(b) tensile strength NOT less than 270 MPa;</li> <li>(c) elongation NOT less than 35% and NOT greater than 50%;</li> <li>(d) coating mass NOT less than 45 g/m<sup>2</sup> and NOT greater than 65 g/m<sup>2</sup> each side;</li> <li>(e) thickness 1.20 mm and width 793 mm.</li> </ul> <p>For the purposes of this order, tolerances allowable for specification (e) are:</p> <ul style="list-style-type: none"> <li>(a) thickness +/- 10%;</li> <li>(b) width +/- 1%.</li> </ul>
TC 1341634	<p>STEEL, flat rolled, non-alloy, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 235 MPa and NOT greater than 400 MPa;</li> <li>(b) tensile strength NOT less than 390 MPa;</li> </ul>

	<p>(c) total elongation NOT less than 28%;</p> <p>(d) total coating mass NOT less than 35 g/m<sup>2</sup> and NOT greater than 65 g/m<sup>2</sup> each side;</p> <p>(e) thickness 2.30 mm and width 940 mm.</p> <p>For the purposes of this order, tolerances allowable for specification (e) are:</p> <p>(a) thickness +/- 10%;</p> <p>(b) width +/- 1%.</p>
TC 1342242	<p>STEEL, flat rolled, non-alloy, hot dipped zinc coated, in coils, having ALL of the following:</p> <p>(a) yield strength NOT less than 340 MPa and NOT greater than 420 MPa;</p> <p>(b) tensile strength NOT less than 410 MPa;</p> <p>(c) elongation NOT less than 21%;</p> <p>(d) coating mass NOT less than 60 g/m<sup>2</sup> and NOT greater than 90 g/m<sup>2</sup> on each side;</p> <p>(e) thickness 2.00 mm and width 1 045 mm.</p> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <p>(a) thickness +/- 10%;</p> <p>(b) width +/- 1%.</p>
TC 1342243	<p>STEEL, flat rolled, non-alloy, hot dipped zinc coated, in coils, having ALL of the following:</p> <p>(a) yield strength NOT less than 180 MPa and NOT greater than 240 MPa;</p> <p>(b) tensile strength NOT less than 300 MPa;</p> <p>(c) elongation NOT less than 33%;</p> <p>(d) coating mass NOT less than 60 g/m<sup>2</sup> and NOT greater than 90 g/m<sup>2</sup> on each side;</p> <p>(e) thickness 1.20 mm and width 1 020 mm.</p> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <p>(a) thickness +/- 10%;</p> <p>(b) width +/- 1%.</p>
TC 1328432	<p>COILS, non-alloy steel, hot rolled, zinc coated, complying with American Society for Testing and Materials Standard A653/A653M- 11 (ASTM A653/A653M-11), having ALL of the following:</p> <p>(a) thickness NOT less than 2.75 mm and NOT greater than 6.0 mm;</p> <p>(b) width NOT less than 784 mm and NOT greater than 1 263 mm;</p> <p>(c) minimum yield strength NOT less than 330 Mpa;</p> <p>(d) minimum tensile strength NOT less than 430 Mpa;</p> <p>(e) inside diameter NOT less than 711 mm and NOT greater than 813 mm;</p> <p>(f) zinc coating mass NOT less than 0.080 kg/m<sup>2</sup> per side;</p>

	<p>(g) weight NOT less than 14 metric tonnes;</p> <p>(h) chemical composition by weight of ALL of the following:</p> <ul style="list-style-type: none"> <li>(i) carbon content NOT greater than 0.20%;</li> <li>(ii) manganese content NOT less than 0.30% and NOT greater than 0.90%;</li> <li>(iii) phosphorus content NOT greater than 0.03%;</li> <li>(iv) sulphur content NOT greater than 0.03%;</li> <li>(v) chromium content less than 0.30%;</li> <li>(vi) molybdenum content less than 0.08%;</li> <li>(vii) aluminium content NOT greater than 0.10%;</li> <li>(viii) copper content NOT greater than 0.25%;</li> <li>(ix) nickel content NOT greater than 0.25%;</li> <li>(x) titanium content NOT greater than 0.04%;</li> <li>(xi) vanadium content less than 0.10%;</li> <li>(xii) silicon content NOT greater than 0.45%.</li> </ul>
<p>TC 1330458</p>	<p>STEEL, flat rolled, non-alloy, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT greater than 250 MPa;</li> <li>(b) tensile strength NOT less than 270 MPa;</li> <li>(c) elongation NOT less than 36%;</li> <li>(d) coating mass on each side NOT less than 30 g/m<sup>2</sup> and NOT greater than 70 g/m<sup>2</sup>;</li> <li>(e) thickness 1.15 mm and width 1 105 mm</li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <ul style="list-style-type: none"> <li>(a) thickness +/- 10%;</li> <li>(b) width +/- 1%.</li> </ul>
<p>TC 1330276</p>	<p>STEEL, flat rolled, non-alloy, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 115 MPa and NOT greater than 305 MPa;</li> <li>(b) tensile strength NOT less than 270 MPa;</li> <li>(c) elongation NOT less than 37% and NOT greater than 57%;</li> <li>(d) total coating mass NOT less than 35 g/m<sup>2</sup> and NOT greater than 65 g/m<sup>2</sup> on each side;</li> <li>(e) thickness 1.00 mm and width 997 mm.</li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <ul style="list-style-type: none"> <li>(a) thickness +/- 10%;</li> <li>(b) width +/- 1%.</li> </ul>
<p>TC 1329958</p>	<p>STEEL, flat rolled, non-alloy, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 155 MPa and NOT greater than 295 MPa;</li> <li>(b) tensile strength NOT less than 340 MPa;</li> </ul>

	<p>(c) total elongation NOT less than 34%;</p> <p>(d) total coating mass NOT less than 35 g/m<sup>2</sup> and NOT greater than 65 g/m<sup>2</sup> on each side;</p> <p>(e) thickness 0.75 mm and width 810 mm.</p> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <p>(a) thickness +/- 10%;</p> <p>(b) width +/- 1%.</p>
TC 1318527	<p>STEEL, flat rolled, non-alloy, hot dipped galvanized, zinc coated, in coils, having ALL of the following:</p> <p>(a) yield strength NOT less than 120 MPa and NOT greater than 180 MPa;</p> <p>(b) tensile strength NOT less than 260 MPa and NOT greater than 350 MPa;</p> <p>(c) elongation NOT less than 37%;</p> <p>(d) total coating mass NOT less than 90 g/m<sup>2</sup>;</p> <p>(e) in ANY of the following sizes:</p> <p>(i) thickness 0.75 mm and width 1 535 mm;</p> <p>(ii) thickness 0.80 mm and width 1 640 mm;</p> <p>(iii) thickness 0.90 mm and width 1 530 mm.</p> <p>For the purposes of this order, tolerances allowable for specification (e) are:</p> <p>(a) thickness +/- 10%;</p> <p>(b) width +/- 1%.</p>
TC 1317486	<p>STEEL, flat rolled, non-alloy, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <p>(a) yield strength NOT less than 235 MPa and NOT greater than 400 MPa;</p> <p>(b) tensile strength NOT less than 390 MPa;</p> <p>(c) elongation NOT less than 28%;</p> <p>(d) coating mass NOT less than 35 g/m<sup>2</sup> and NOT greater than 65 g/m<sup>2</sup> on each side;</p> <p>(e) thickness 2.00 mm and width 785 mm.</p> <p>For the purposes of this order, tolerances allowable for specification (e) are:</p> <p>(a) thickness +/- 10%;</p> <p>(b) width +/- 1%.</p>
TC 1316841	<p>STEEL, flat rolled, non-alloy, hot dipped zinc coated, in coils, having ALL of the following:</p> <p>(a) yield strength NOT less than 110 MPa and NOT greater than 280 MPa;</p> <p>(b) tensile strength NOT less than 260 MPa;</p> <p>(c) elongation NOT less than 37%;</p> <p>(d) coating mass NOT less than 45 g/m<sup>2</sup> and NOT greater than</p>

100 g/m<sup>2</sup> on each side;

(e) in ANY of the following sizes:

- (i) thickness 0.60 mm and width 1 670 mm;
- (ii) thickness 0.65 mm and width 960 mm;
- (iii) thickness 0.65 mm and width 1 075 mm;
- (iv) thickness 0.65 mm and width 1 160 mm;
- (v) thickness 0.65 mm and width 1 240 mm;
- (vi) thickness 0.65 mm and width 1 425 mm;
- (vii) thickness 0.65 mm and width 1 430 mm;
- (viii) thickness 0.65 mm and width 1 445 mm;
- (ix) thickness 0.65 mm and width 1 630 mm;
- (x) thickness 0.65 mm and width 1 730 mm;
- (xi) thickness 0.70 mm and width 810 mm;
- (xii) thickness 0.70 mm and width 840 mm;
- (xiii) thickness 0.70 mm and width 850 mm;
- (xiv) thickness 0.70 mm and width 890 mm;
- (xv) thickness 0.70 mm and width 896 mm;
- (xvi) thickness 0.70 mm and width 1 390 mm;
- (xvii) thickness 0.70 mm and width 1 400 mm;
- (xviii) thickness 0.70 mm and width 1 410 mm;
- (xix) thickness 0.70 mm and width 1 440 mm;
- (xx) thickness 0.70 mm and width 1 460 mm;
- (xxi) thickness 0.70 mm and width 1 540 mm;
- (xxii) thickness 0.70 mm and width 1 590 mm;
- (xxiii) thickness 0.70 mm and width 1 650 mm;
- (xxiv) thickness 0.70 mm and width 1 655 mm;
- (xxv) thickness 0.75 mm and width 1 600 mm;
- (xxvi) thickness 0.75 mm and width 1 695 mm;
- (xxvii) thickness 0.75 mm and width 1 760 mm;
- (xxviii) thickness 0.80 mm and width 680 mm;
- (xxix) thickness 0.80 mm and width 1 185 mm;
- (xxx) thickness 0.80 mm and width 1 300 mm;
- (xxxi) thickness 0.80 mm and width 1 370 mm;
- (xxxii) thickness 0.80 mm and width 1 325 mm;
- (xxxiii) thickness 0.80 mm and width 1 545 mm;
- (xxxiv) thickness 0.80 mm and width 1 600 mm;
- (xxxv) thickness 0.80 mm and width 1 695 mm;
- (xxxvi) thickness 0.80 mm and width 1 760 mm;
- (xxxvii) thickness 0.80 mm and width 1 840 mm;
- (xxxviii) thickness 0.90 mm and width 950 mm;
- (xxxix) thickness 0.90 mm and width 1 530 mm;
- (xl) thickness 0.90 mm and width 1 800 mm;
- (xli) thickness 1.20 mm and width 1 730 mm;
- (xlii) thickness 1.20 mm and width 1 770 mm.

For the purposes of this Order, tolerances allowable for specification (e) are:

- (a) thickness +/- 10%;
- (b) width +/- 1%.

TC 1312163	<p>STEEL, flat rolled, non-alloy, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT greater than 250 MPa;</li> <li>(b) tensile strength NOT less than 270 MPa;</li> <li>(c) elongation NOT less than 36%;</li> <li>(d) coating mass on each side NOT less than 30 g/m<sup>2</sup> and NOT greater than 70 g/m<sup>2</sup>;</li> <li>(e) in ANY of the following sizes: <ul style="list-style-type: none"> <li>(i) thickness 0.75 mm and width 890 mm;</li> <li>(ii) thickness 0.75 mm and width 970 mm;</li> <li>(iii) thickness 0.75 mm and width 1 450 mm;</li> <li>(iv) thickness 0.76 mm and width 1 220 mm;</li> <li>(v) thickness 0.95 mm and width 820 mm;</li> <li>(vi) thickness 1.15 mm and width 740 mm;</li> <li>(vii) thickness 1.20 mm and width 955 mm.</li> </ul> </li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <ul style="list-style-type: none"> <li>(a) thickness +/- 10%;</li> <li>(b) width +/- 1%.</li> </ul>
TC 1310746	<p>STEEL, flat rolled, non-alloy, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT greater than 250 MPa;</li> <li>(b) tensile strength NOT less than 270 MPa;</li> <li>(c) elongation NOT less than 36%;</li> <li>(d) coating mass on each side NOT less than 30 g/m<sup>2</sup> and NOT greater than 70 g/m<sup>2</sup>;</li> <li>(e) in ANY of the following sizes: <ul style="list-style-type: none"> <li>(i) thickness 0.65 mm and width 1 640 mm;</li> <li>(ii) thickness 1.00 mm and width 1 588 mm;</li> <li>(iii) thickness 1.15 mm and width 1 628 mm;</li> <li>(iv) thickness 2.20 mm and width 910 mm.</li> </ul> </li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <ul style="list-style-type: none"> <li>(a) thickness +/- 10%;</li> <li>(b) width +/- 1%.</li> </ul>
TC 1309160	<p>STEEL, flat rolled, non-alloy, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 120 MPa and NOT greater than 180 MPa;</li> <li>(b) tensile strength NOT less than 260 MPa and NOT greater than 350 MPa;</li> <li>(c) total elongation NOT less than 37%;</li> <li>(d) total coating mass NOT less than 90 g/m<sup>2</sup>;</li> <li>(e) thickness 0.80 mm and width 1 640 mm.</li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e)</p>

	<p>are:</p> <ul style="list-style-type: none"> <li>(a) thickness +/- 10%;</li> <li>(b) width +/- 1%.</li> </ul>
TC 1308125	<p>STEEL, flat rolled, non-alloy, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 155 MPa and NOT greater than 295 MPa;</li> <li>(b) tensile strength NOT less than 340 MPa;</li> <li>(c) elongation NOT less than 34%;</li> <li>(d) coating mass NOT less than 35 g/m<sup>2</sup> and NOT greater than 65 g/m<sup>2</sup> on each side;</li> <li>(e) thickness 0.75 mm and width 1 600 mm.</li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <ul style="list-style-type: none"> <li>(a) thickness +/- 10%;</li> <li>(b) width +/- 1%.</li> </ul>
TC 1308121	<p>STEEL, flat rolled, non-alloy, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 160 MPa and NOT greater than 325 MPa;</li> <li>(b) tensile strength NOT less than 270 MPa;</li> <li>(c) elongation NOT less than 35% and NOT greater than 50%;</li> <li>(d) coating mass NOT less than 45 g/m<sup>2</sup> and NOT greater than 65 g/m<sup>2</sup> on each side;</li> <li>(e) in ANY of the following sizes: <ul style="list-style-type: none"> <li>(i) thickness 1.00 mm and width 878 mm;</li> <li>(ii) thickness 1.20 mm and width 801 mm;</li> <li>(iii) thickness 1.20 mm and width 1 049 mm;</li> <li>(iv) thickness 1.40 mm and width 1 030 mm;</li> <li>(v) thickness 1.60 mm and width 870 mm;</li> <li>(vi) thickness 1.60 mm and width 1 172 mm;</li> <li>(vii) thickness 1.80 mm and width 960 mm;</li> <li>(viii) thickness 1.80 mm and width 1 175 mm;</li> <li>(ix) thickness 2.00 mm and width 1 070 mm.</li> </ul> </li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <ul style="list-style-type: none"> <li>(a) thickness +/- 10%;</li> <li>(b) width +/- 1%.</li> </ul>
TC 1308073	<p>STEEL, flat rolled, non-alloy, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 235 MPa and NOT greater than 400 MPa;</li> <li>(b) tensile strength NOT less than 390 MPa;</li> <li>(c) elongation NOT less than 28%;</li> <li>(d) coating mass NOT less than 35 g/m<sup>2</sup> and NOT greater than</li> </ul>



	<p>65 g/m<sup>2</sup> on each side;</p> <p>(e) in ANY of the following sizes:</p> <ul style="list-style-type: none"> <li>(i) thickness 1.00 mm and width 1 150 mm;</li> <li>(ii) thickness 1.00 mm and width 1 225 mm;</li> <li>(iii) thickness 1.20 mm and width 940 mm;</li> <li>(iv) thickness 1.20 mm and width 970 mm;</li> <li>(v) thickness 1.20 mm and width 1 050 mm;</li> <li>(vi) thickness 1.40 mm and width 930 mm;</li> <li>(vii) thickness 1.40 mm and width 960 mm;</li> <li>(viii) thickness 1.40 mm and width 975 mm;</li> <li>(ix) thickness 1.40 mm and width 1 110 mm;</li> <li>(x) thickness 1.60 mm and width 1 080 mm;</li> <li>(xi) thickness 1.60 mm and width 1 165 mm;</li> <li>(xii) thickness 1.60 mm and width 1 300 mm;</li> <li>(xiii) thickness 1.60 mm and width 1 318 mm;</li> <li>(xiv) thickness 1.80 mm and width 1 082 mm;</li> <li>(xv) thickness 2.00 mm and width 792 mm;</li> <li>(xvi) thickness 2.00 mm and width 850 mm;</li> <li>(xvii) thickness 2.00 mm and width 990 mm;</li> <li>(xviii) thickness 2.00 mm and width 1 020 mm;</li> <li>(xix) thickness 2.00 mm and width 1 280 mm;</li> <li>(xx) thickness 2.00 mm and width 1 282 mm;</li> <li>(xxi) thickness 2.00 mm and width 1 310 mm.</li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <ul style="list-style-type: none"> <li>(a) thickness +/- 10%;</li> <li>(b) width +/- 1%.</li> </ul>
<p>TC 1308115</p>	<p>STEEL, flat rolled, non-alloy, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 115 MPa and NOT greater than 305 MPa;</li> <li>(b) tensile strength NOT less than 270 MPa;</li> <li>(c) elongation NOT less than 37% and NOT greater than 57%;</li> <li>(d) coating mass NOT less than 35 g/m<sup>2</sup> and NOT greater than 65 g/m<sup>2</sup> on each side;</li> <li>(e) in ANY of the following sizes: <ul style="list-style-type: none"> <li>(i) thickness 0.55 mm and width 1 117 mm;</li> <li>(ii) thickness 0.55 mm and width 1 201 mm;</li> <li>(iii) thickness 0.60 mm and width 1 473 mm;</li> <li>(iv) thickness 0.65 mm and width 895 mm;</li> <li>(v) thickness 0.65 mm and width 1 275 mm;</li> <li>(vi) thickness 0.65 mm and width 1 595 mm;</li> <li>(vii) thickness 0.70 mm and width 870 mm;</li> <li>(viii) thickness 0.75 mm and width 1 090 mm;</li> <li>(ix) thickness 0.75 mm and width 1 450 mm;</li> <li>(x) thickness 0.80 mm and width 1 214 mm;</li> <li>(xi) thickness 0.80 mm and width 1 700 mm;</li> <li>(xii) thickness 1.00 mm and width 815 mm;</li> </ul> </li> </ul>

	<p>(xiii) thickness 1.00 mm and width 1 180 mm;  (xiv) thickness 1.40 mm and width 933 mm  (xv) thickness 1.40 mm and width 1 070 mm;  (xvi) thickness 1.80 mm and width 835 mm;  (xvii) thickness 1.80 mm and width 1 022 mm.</p> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <p>(a) thickness +/- 10%;  (b) width +/- 1.</p>
TC 1307948	<p>STEEL, flat rolled, non-alloy, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <p>(a) yield strength NOT less than 190 MPa;  (b) tensile strength NOT less than 340 MPa;  (c) elongation NOT less than 32%;  (d) coating mass NOT less than 30 g/m<sup>2</sup> and NOT greater than 70 g/m<sup>2</sup> on each side;  (e) in EITHER of the following sizes:  (i) thickness 0.70 mm and width 1 740 mm;  (ii) thickness 1.00 mm and width 1 225 mm.</p> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <p>(a) thickness +/- 10%;  (b) width +/- 1%.</p>
TC 1304297	<p>STEEL, flat rolled non-alloy, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <p>(a) yield strength NOT less than 275 MPa and NOT greater than 380 MPa;  (b) tensile strength NOT less than 440 MPa;  (c) elongation NOT less than 30%.  (d) coating mass NOT less than 45 g/m<sup>2</sup> and NOT greater than 65 g/m<sup>2</sup> on each side;  (e) thickness 2.00 mm and width 792 mm.</p> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <p>(a) thickness +/- 10%;  (b) width +/- 1%.</p>
TC 1248929	<p>STEEL, flat rolled, non-alloy steel, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <p>(a) yield strength NOT greater than 210 MPa;  (b) tensile strength NOT less than 270 MPa;  (c) total elongation NOT less than 40%;  (d) total coating mass NOT less than 30 g/m<sup>2</sup> and NOT greater than 70 g/m<sup>2</sup> on each side;  (e) in ANY of the following sizes:</p>

	<ul style="list-style-type: none"> <li>(i) thickness 0.75 mm and width 1 390 mm;</li> <li>(ii) thickness 0.75 mm and width 1 450 mm;</li> <li>(iii) thickness 0.75 mm and width 1 475 mm;</li> <li>(iv) thickness 0.75 mm and width 1 530 mm;</li> <li>(v) thickness 0.75 mm and width 1 565 mm;</li> <li>(vi) thickness 0.75 mm and width 1 640 mm;</li> <li>(vii) thickness 0.76 mm and width 1 220 mm;</li> <li>(viii) thickness 0.80 mm and width 1 350 mm;</li> <li>(ix) thickness 0.95 mm and width 820 mm;</li> <li>(x) thickness 1.00 mm and width 624 mm.</li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <ul style="list-style-type: none"> <li>(a) thickness +/- 10%;</li> <li>(b) width +/- 1%.</li> </ul>
<p>TC 1248930</p>	<p>STEEL, flat rolled, non-alloy steel, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 190 MPa;</li> <li>(b) tensile strength NOT less than 340 MPa;</li> <li>(c) total elongation NOT less than 32%;</li> <li>(d) total coating mass NOT less than 30 g/m<sup>2</sup> and NOT greater than 70 g/m<sup>2</sup> on each side;</li> <li>(e) in ANY of the following sizes: <ul style="list-style-type: none"> <li>(i) thickness 0.70 mm and width 865 mm;</li> <li>(ii) thickness 0.70 mm and width 980 mm;</li> <li>(iii) thickness 0.70 mm and width 1 225 mm;</li> <li>(iv) thickness 0.70 mm and width 1 244 mm;</li> <li>(v) thickness 0.70 mm and width 1 300 mm;</li> <li>(vi) thickness 0.70 mm and width 1 350 mm;</li> <li>(vii) thickness 0.70 mm and width 1 370 mm;</li> <li>(viii) thickness 0.70 mm and width 1 400 mm;</li> <li>(ix) thickness 0.70 mm and width 1 410 mm;</li> <li>(x) thickness 0.70 mm and width 1 455 mm;</li> <li>(xi) thickness 0.70 mm and width 1 500 mm;</li> <li>(xii) thickness 0.70 mm and width 1 585 mm;</li> <li>(xiii) thickness 0.70 mm and width 1 710 mm;</li> <li>(xiv) thickness 0.70 mm and width 1 720 mm;</li> <li>(xv) thickness 0.65 mm and width 865 mm;</li> <li>(xvi) thickness 0.65 mm and width 1 800 mm;</li> <li>(xvii) thickness 1.00 mm and width 1 160 mm.</li> </ul> </li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <ul style="list-style-type: none"> <li>(a) thickness +/- 10%;</li> <li>(b) width +/- 1%.</li> </ul>
<p>TC 1349350</p>	<p>STEEL, flat rolled, non-alloy steel, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 165 MPa and NOT greater than</li> </ul>

	<p>325 MPa;</p> <p>(b) tensile strength NOT less than 270 MPa;</p> <p>(c) total elongation NOT less than 35% and NOT greater than 50%;</p> <p>(d) total coating mass NOT less than 45 g/m<sup>2</sup> and NOT greater than 65 g/m<sup>2</sup> on each side;</p> <p>(e) thickness 2.00 mm and width 1 070 mm.</p> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <p>(a) thickness +/- 10%;</p> <p>(b) width +/- 1%.</p>
<p>TC 1349351</p>	<p>STEEL, flat rolled, non-alloy steel, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <p>(a) yield strength NOT less than 115 MPa and NOT greater than 305 MPa;</p> <p>(b) tensile strength NOT less than 270 MPa;</p> <p>(c) total elongation NOT less than 37% and NOT greater than 57%;</p> <p>(d) total coating mass NOT less than 35 g/m<sup>2</sup> and NOT greater than 65 g/m<sup>2</sup> on each side;</p> <p>(e) in ANY of the following sizes:</p> <ul style="list-style-type: none"> <li>(i) thickness 0.65 mm and width 870 mm;</li> <li>(ii) thickness 0.65 mm and width 930 mm;</li> <li>(iii) thickness 0.65 mm and width 1 150 mm;</li> <li>(iv) thickness 0.65 mm and width 1 640 mm;</li> <li>(v) thickness 0.65 mm and width 1 645 mm;</li> <li>(vi) thickness 0.65 mm and width 1 680 mm;</li> <li>(vii) thickness 0.65 mm and width 1 710 mm;</li> <li>(viii) thickness 0.70 mm and width 925 mm;</li> <li>(ix) thickness 0.70 mm and width 930 mm;</li> <li>(x) thickness 0.70 mm and width 1 000 mm;</li> <li>(xi) thickness 0.70 mm and width 1 005 mm;</li> <li>(xii) thickness 0.70 mm and width 1 010 mm;</li> <li>(xiii) thickness 0.70 mm and width 1 045 mm;</li> <li>(xiv) thickness 0.70 mm and width 1 455 mm;</li> <li>(xv) thickness 0.70 mm and width 1 485 mm;</li> <li>(xvi) thickness 0.70 mm and width 1 550 mm;</li> <li>(xvii) thickness 0.75 mm and width 1 135 mm;</li> <li>(xviii) thickness 0.75 mm and width 1 140 mm;</li> <li>(xix) thickness 0.75 mm and width 1 625 mm;</li> <li>(xx) thickness 0.75 mm and width 1 670 mm;</li> <li>(xxi) thickness 0.80 mm and width 1 060 mm;</li> <li>(xxii) thickness 0.80 mm and width 1 150 mm;</li> <li>(xxiii) thickness 0.80 mm and width 1 200 mm;</li> <li>(xxiv) thickness 1.00 mm and width 1 610 mm;</li> <li>(xxv) thickness 1.20 mm and width 1 595 mm;</li> <li>(xxvi) thickness 2.30 mm and width 985 mm.</li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p>

	<ul style="list-style-type: none"> <li>(a) thickness +/- 10%;</li> <li>(b) width +/- 1.</li> </ul>
<p>TC 1349352</p>	<p>STEEL, flat rolled, non-alloy steel, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 155 MPa and NOT greater than 295 MPa;</li> <li>(b) tensile strength NOT less than 340 MPa;</li> <li>(c) total elongation NOT less than 34%;</li> <li>(d) total coating mass NOT less than 35 g/m<sup>2</sup> and NOT greater than 65 g/m<sup>2</sup> on each side;</li> <li>(e) in ANY of the following sizes: <ul style="list-style-type: none"> <li>(i) thickness 0.70 mm and width 830 mm;</li> <li>(ii) thickness 0.70 mm and width 855 mm;</li> <li>(iii) thickness 0.75 mm and width 840 mm;</li> <li>(iv) thickness 0.75 mm and width 855 mm;</li> <li>(v) thickness 0.75 mm and width 1 630 mm;</li> <li>(vi) thickness 0.75 mm and width 1 645 mm;</li> <li>(vii) thickness 0.75 mm and width 1 683 mm;</li> <li>(viii) thickness 0.75 mm and width 1 700 mm;</li> <li>(ix) thickness 1.20 mm and width 1 170 mm;</li> <li>(x) thickness 1.20 mm and width 1 175 mm;</li> <li>(xi) thickness 1.20 mm and width 1 198 mm;</li> <li>(xii) thickness 1.60 mm and width 1 160 mm.</li> </ul> </li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <ul style="list-style-type: none"> <li>(a) thickness +/- 10%;</li> <li>(b) width +/- 1%.</li> </ul>
<p>TC 1349354</p>	<p>STEEL, flat rolled, non-alloy steel, hot dipped galvanized zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 235 MPa and NOT greater than 400 MPa;</li> <li>(b) tensile strength NOT less than 390 MPa;</li> <li>(c) total elongation NOT less than 28%;</li> <li>(d) total coating mass NOT less than 35 g/m<sup>2</sup> and NOT greater than 65 g/m<sup>2</sup> on each side;</li> <li>(e) in ANY of the following sizes: <ul style="list-style-type: none"> <li>(i) thickness 2.00 mm and width 975 mm;</li> <li>(ii) thickness 2.30 mm and width 948 mm;</li> <li>(iii) thickness 2.30 mm and width 1 030 mm;</li> <li>(iv) thickness 2.30 mm and width 1 190 mm;</li> <li>(v) thickness 2.60 mm and width 1 230 mm.</li> </ul> </li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <ul style="list-style-type: none"> <li>(a) thickness +/- 10%;</li> <li>(b) width +/- 1%.</li> </ul>

TC 1242989	<p>COILS, non-alloy steel, hot rolled, zinc coated, complying with American Society for Testing and Materials Standard ASTM A 653/A 653M - 05a, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) coil thickness NOT less than 3.5 mm and NOT greater than 6.0 mm;</li> <li>(b) coil width NOT less than 784 mm and NOT greater than 1 263 mm;</li> <li>(c) minimum yield strength NOT less than 330 Mpa;</li> <li>(d) minimum tensile strength NOT less than 430 Mpa;</li> <li>(e) coil inside diameter NOT less than 711 mm and NOT greater than 813 mm;</li> <li>(f) zinc coating mass NOT less than 0.080 kg/m<sup>2</sup> per side;</li> <li>(g) each coil weighing NOT less than 14 metric tonnes;</li> <li>(h) chemical composition by weight of ALL of the following: <ul style="list-style-type: none"> <li>(i) carbon content NOT greater than 0.20%;</li> <li>(ii) manganese content NOT less than 0.30% and NOT greater than 0.90%;</li> <li>(iii) phosphorus content NOT greater than 0.03%;</li> <li>(iv) sulphur content NOT greater than 0.03%;</li> <li>(v) chromium content less than 0.30%;</li> <li>(vi) molybdenum content less than 0.08%;</li> <li>(vii) aluminium content NOT greater than 0.10%;</li> <li>(viii) copper content NOT greater than 0.25%;</li> <li>(ix) nickel content NOT greater than 0.25%;</li> <li>(x) titanium content NOT greater than 0.04%;</li> <li>(xi) vanadium content less than 0.10%;</li> <li>(xii) silicon content NOT greater than 0.45%.</li> </ul> </li> </ul>
TC 0939596	<p>STEEL, COIL, hot dip zinc coated, complying with Japanese Industrial Standard JIS G 3302:2007, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 275 N/mm<sup>2</sup> and NOT greater than 380 N/mm<sup>2</sup>;</li> <li>(b) tensile strength NOT less than 440 N/mm<sup>2</sup>;</li> <li>(c) elongation NOT less than 29% and NOT greater than 41%;</li> <li>(d) coating mass NOT less than 45 g/m<sup>2</sup> and NOT greater than 65 g/m<sup>2</sup>;</li> <li>(e) thickness NOT less than 1.14 mm and NOT greater than 1.26 mm;</li> <li>(f) width NOT less than 1 590 mm and NOT greater than 1 605 mm.</li> </ul>
<b>TCOs applicable to 7225.92.00</b>	
TC 1316844	<p>STEEL, flat rolled, alloy, hot dipped zinc coated, in coils, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 340 MPa and NOT greater than 700 MPa;</li> <li>(b) tensile strength NOT less than 590 MPa;</li> <li>(c) elongation NOT less than 10%;</li> <li>(d) coating mass NOT less than 60 g/m<sup>2</sup> and NOT greater than 120 g/m<sup>2</sup> on each side;</li> </ul>

	<p>(e) in ANY of the following sizes:</p> <ul style="list-style-type: none"> <li>(i) thickness 1.20 mm and width 615 mm;</li> <li>(ii) thickness 1.20 mm and width 623 mm;</li> <li>(iii) thickness 1.20 mm and width 1 115 mm;</li> <li>(iv) thickness 1.20 mm and width 1 240 mm;</li> <li>(v) thickness 1.20 mm and width 1 256 mm;</li> <li>(vi) thickness 1.40 mm and width 900 mm;</li> <li>(vii) thickness 1.80 mm and width 970 mm;</li> <li>(viii) thickness 2.00 mm and width 889 mm;</li> <li>(ix) thickness 2.00 mm and width 970 mm;</li> <li>(x) thickness 2.00 mm and width 992 mm.</li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <ul style="list-style-type: none"> <li>(a) thickness +/- 10%;</li> <li>(b) width +/- 1%.</li> </ul>
<p>TC 1309154</p>	<p>STEEL, flat rolled, alloy, hot dipped zinc coated, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) yield strength NOT less than 700 MPa and NOT greater than 900 MPa;</li> <li>(b) tensile strength NOT less than 980 MPa and NOT greater than 1 200 MPa;</li> <li>(c) total elongation NOT less than 10%;</li> <li>(d) total coating mass NOT less than 60 g/m<sup>2</sup> and NOT greater than 90 g/m<sup>2</sup> on each side;</li> <li>(e) thickness 0.90 mm and width 1 020 mm.</li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (e) are:</p> <ul style="list-style-type: none"> <li>(a) thickness +/- 10%;</li> <li>(b) width +/- 1%.</li> </ul>
<p><b>TCOs applicable to 7226.99.00</b></p>	
<p>TC 1330258</p>	<p>STEEL, flat rolled, alloy, having ALL of the following:</p> <ul style="list-style-type: none"> <li>(a) hot dipped coating of NOT less than 85% aluminium;</li> <li>(b) hot dipped coating silicon content NOT less than 5% and NOT greater than 11%;</li> <li>(c) total coating mass NOT less than 50 g/m<sup>2</sup> and NOT greater than 110 g/m<sup>2</sup> on each side;</li> <li>(d) yield strength NOT less than 300 MPa;</li> <li>(e) tensile strength NOT less than 500 MPa;</li> <li>(f) total elongation NOT less than 12%;</li> <li>(g) in BOTH of the following sizes: <ul style="list-style-type: none"> <li>(i) thickness 1.00 mm and width 232 mm;</li> <li>(ii) thickness 1.40 mm and width 454 mm.</li> </ul> </li> </ul> <p>For the purposes of this Order, tolerances allowable for specification (g) are:</p>

	(a) thickness +/- 10%; (b) width +/- 1%.
TC 0826920	STEEL PLATE, having BOTH of the following: (a) nickel content greater than 34%; (b) width less than 600 mm.
TC 9304094	BARS, flat, to specification AISI-01, having a thickness NOT exceeding 100 mm or a width NOT exceeding 300 mm.
TC 9504060	FLATS, high alloy, to specification DIN 100MnCrW4, BS B01 or AISI01.
TC 9804815	STRIP, STEEL, in coils, hardened, sharpened on one or both edges, thickness 1.5 mm to 4 mm, width 19 mm to 50 mm.



IDD/DD and/or ICD/CD	Exemption Category	Relevant Tariff Concession Order (TCO) Number	Effective date	Public Record
Dumping	Subsection 8(7)	7210.49.00 (TC 1242989, TC 1317796, TC 0939596, TC 1248929, TC 1248930, TC 1349350, TC 1349351, TC 1349352, TC 1349354)	6-Feb-13	<a href="http://www.adcommission.gov.au/cases/documents/145-ExemptionInstrument1of2013.pdf">http://www.adcommission.gov.au/cases/documents/145-ExemptionInstrument1of2013.pdf</a>
Countervailing	Subsection 10(8)	7210.49.00 (TC 1242989, TC 1317796, TC 0939596, TC 1248929, TC 1248930, TC 1349350, TC 1349351, TC 1349352, TC 1349354)	25-Jul-13	<a href="http://www.adcommission.gov.au/cases/documents/146-ExemptionInstrument2of2013.pdf">http://www.adcommission.gov.au/cases/documents/146-ExemptionInstrument2of2013.pdf</a>
Dumping & Countervailing	Subsections 8(7) and 10(8)	7210.49.00 (TC 1309160)	5-Aug-13	<a href="http://www.adcommission.gov.au/cases/EX0009.asp">http://www.adcommission.gov.au/cases/EX0009.asp</a>
Dumping & Countervailing	Subsections 8(7) and 10(8)	7210.49.00 and 7210.30.00 (TC 1316842, TC 1316841)	4-Sep-13	<a href="http://www.adcommission.gov.au/cases/EX0012.asp">http://www.adcommission.gov.au/cases/EX0012.asp</a>
Dumping & Countervailing	Subsections 8(7) and 10(8)	7210.49.00 (TC 1318527)	21-Oct-13	<a href="http://www.adcommission.gov.au/cases/EX0013.asp">http://www.adcommission.gov.au/cases/EX0013.asp</a>