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Mr Adam Yacono
Manager
Anti-Dumping Commission
Australian Customs and Border Protection Service
Customs House Docklands
1010 La Trobe St
Melbourne Victoria

commercial+international

By email

Dear Mr Yacono

Hyundai Steel Company – hot-rolled structural sections Response to applicant’s submission re comparative products

We refer to a submission from the applicant in this matter which has been placed on the public record, headed “*Exporter briefing – Hyundai Steel Company*”.

On page 3 of this submission, under the heading “*Pricing for Grades SS400 and SM400*” the applicant makes this statement:

Hyundai sells domestically Grades SS400 and SM400 which it is suggested are like goods to export sales to Australia of goods to AS/NZS 3679.1. OneSteel does not agree with this proposition. OneSteel is aware that the most comparable grade to meet the minimum yield tolerance for grade S/NZ 3679.1 is the JIS grade SM490.

We are presently engaged in a verification process with officials of the Commission, during which we intend to address questions relating to product comparisons in detail. However, for the immediate benefit of the Commission, Hyundai Steel wishes to make the following matters quite clear.

- 1 During the period of investigation, Hyundai Steel only sold goods to Australia that match the AS/NZS 3678 300 standard. Hyundai Steel did not sell goods to Australia that meet the higher standard AS/NZS 3678 350 standard. As the name indicates, products that meet the 350 standard are higher grade products. The 350 standard calls for products with, amongst other things, higher tensile strength.
- 2 In Section C of its Exporter Questionnaire response, Hyundai Steel presented a coding system in order to properly match the export sales to the relevant domestic sales for normal value purposes. In order to assist in the proper interpretation of those codes, we include the further explanation as attached. This is an important document and appears to have been missing from the original EQ response. Hyundai Steel’s domestic sales grades that match to the 300 export grade are the A36, Grade A, S275JR, SA36, SM400 and SS400 products.
- 3 We find the above-extracted statement made by the applicant to be confusing, however it could

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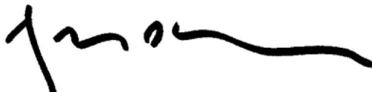
be taken to suggest that SM490 (and SS490) should be included in the universe of domestic goods that are comparable to any exports to Australia that meet the standard that the applicant refers to as "AS/NZ 3679.1".

- 4 For the avoidance of doubt, we simply wish to clarify that Hyundai's exports to Australia do not meet the 350 standard. Hyundai Steel only exported 300 standard products to Australia. Therefore, Hyundai Steel's SM490 and SS490 grades sold on the domestic market – being products that meet the requirements of the 350 standard – are not comparative to Hyundai Steel's export sales and must not be considered to be relevant for normal value purposes.
- 5 Please find attached relevant pages from the product catalogue information issued by the Australian steel manufacturer BlueScope Steel which demonstrate the product differentiation between steel graded to the respective AS/NZ 300 and 350 standards. As can be seen, the industry accepts that the "nearest overseas specifications" to AS/NZ 300 include SS400 and SM400A.¹ The JIS standard product (JISG 3106-SM490A) is referenced by BlueScope Steel as being one of the nearest equivalent international grades to AS/NZ 350.

Hyundai Steel wishes to ensure that the applicant's response is not taken to suggest that SS490 and SM490 grade products should be included in the universe of Hyundai Steel's domestic sales for normal value purposes. Those products are not equivalent to Hyundai Steel's exports to Australia.

The equivalent products are those which match the product codes of the exported products, as explained in Section E of our client's EQ response.

Yours sincerely



Daniel Moulis
Principal

Encs

¹ The "A" designates no impact test.

AS/NZS 3678 - 300

XLERPLATE® steel

DATE: AUGUST 2009

PRODUCT DESCRIPTION

- A medium strength structural steel plate product with nominal yield strength of 300 MPa

SUPPLY CONDITIONS

- Thickness Range: 8mm – 60mm
- Availability: By Enquiry
- Edge Condition: Untrimmed (Mill Edge) / Trimmed
- Tolerances: AS/NZS 1365
- Ultrasonic Inspection: AS1710 available .
- Surface Inspection: BlueScope Steel (third party available)
- Certification: BlueScope Steel (third party endorsed available)

(1) Optional supply condition. May be subject to size range restrictions.

TYPICAL USES

- General fabrication
- Structural members
- High-rise buildings
- Bridges
- Storage tanks

FEATURES & BENEFITS

- Guaranteed minimum strength levels
- Excellent weldability
- Excellent formability

WARNINGS

- This material should be used in conjunction with the appropriate structural design and welding standards.
- An untrimmed (Mill) edge may contain minor surface discontinuities as a result of the rolling process (refer Clause 7 AS/NZS 3678). It is recommended that a minimum of 50mm be removed from each untrimmed edge.
- Where impact testing is required refer to AS/NZS 3678 - 300L15.

NEAREST OVERSEAS SPECIFICATIONS

ASTM A36 ISO 630-E275B JISG 3101-SS400 JISG 3106-SM400A EN 10025-2-S275JR

For more information contact:

BlueScope Steel Direct

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Email: steeldirect@bluescopesteel.com

Website: www.xlerplate.com.au

Date Published: August 2009. The information contained in this datasheet is provided by way of general information only, and should not be relied upon by any person. You must seek specific advice as to the suitability of this product for the purpose for which, and the manner in which, you propose to use it. This may involve further independent analysis and testing. BlueScope Steel Limited and its related bodies corporate take no responsibility for any adverse consequences of any nature which arise as a result of reliance on this datasheet. These datasheets will be updated from time to time and the most up-to-date versions are available from www.xlerplate.com.au

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AS/NZS 3678 - 300

XLERPLATE® steel

CHEMICAL COMPOSITION				
Element	Guaranteed Maximum % ⁽¹⁾	Typical % Thickness (mm)		
		8 ≤ t ≤ 40	40 < t ≤ 60	
Carbon	0.22	0.14	0.15	
Silicon	0.55	0.20	0.30	
Manganese	1.70	1.10	1.20	
Phosphorus	0.040	0.020	0.020	
Sulfur	0.030	0.010	0.010	
Aluminium	0.100	0.025	0.025	
Titanium	0.040	0.018	0.018	
CEQ (IIW) ⁽¹⁾	0.44	0.33	0.36	

$$(1) \text{ CEQ (IIW)} = C + \frac{\text{Mn}}{6} + \frac{(\text{Cr} + \text{Mo} + \text{V})}{5} + \frac{(\text{Cu} + \text{Ni})}{15}$$

(2) All values shown refer to the relevant Australian Standard unless stated otherwise

MECHANICAL PROPERTIES				
Tensile Properties (Transverse)		Thickness Range (mm)		
		8 < t ≤ 12	12 < t ≤ 20	20 < t ≤ 60
Guaranteed Min.	Yield Strength (MPa)	310	300	280
	Tensile Strength (MPa)	430	430	430
	Elong. on 5.65 √ So (%)	21	21	21
Typical	Yield Strength (MPa)	320 - 410	310 - 390	290 - 370
	Tensile Strength (MPa)	440 - 540	440 - 510	440 - 490
	Elong. on 5.65 √ So (%)	24 - 34	24 - 36	24 - 34
Charpy Impact Properties - Longitudinal		Typically would expect to meet		27J MIN. Avg. of 3 and 20J MIN. Individual at 0°C

WELDABILITY			
Group 4 ⁽³⁾	Guaranteed Maximum	Typical Group / Thickness (mm)	
		8 ≤ t ≤ 40	40 < t ≤ 60
	4	2	3

(3) Refer to WTIA Technical Note 1 or AS/NZS 1554.1

FORMABILITY (recommended min. inside radii)			HARDNESS
6 < t ≤ 10	Long 2.25T	Trans 1.5T	Typical 130 - 170 BHN
10 < t ≤ 20mm	Long 3.0T	Trans 2.0T	
20 < t ≤ 50mm	Long 6.0T	Trans 4.0T	
t > 50mm	Hot form		

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AS/NZS 3678 - 350

XLERPLATE® steel

DATE: AUGUST 2009

PRODUCT DESCRIPTION

- A high strength structural steel product with nominal yield strength of 350 MPa

SUPPLY CONDITIONS

- Thickness Range: 5mm – 100mm (thicknesses greater than 80mm are available by enquiry)
- Availability: Plate is available in standard sizes. For sizes outside the standard plate offer refer to XLERPLATE® steel Size Schedule 2.
- Edge Condition: Untrimmed (Mill Edge) / Trimmed
- Tolerances: AS/NZS 1365
- Ultrasonic Inspection: AS1710 available
- Surface Inspection: BlueScope Steel (third party available)
- Certification: BlueScope Steel (third party endorsed available)

(1) Optional supply condition. May be subject to size range restrictions.

TYPICAL USES

- General fabrication
- Structural members
- High-rise buildings
- Bridges
- Storage tanks

FEATURES & BENEFITS

- Guaranteed minimum strength levels
- Excellent weldability
- Good formability

WARNINGS

- This material should be used in conjunction with the appropriate structural design and welding standards.
- Maximum recommended temperature for hot forming 620°C. If heated above 620°C, mechanical properties may deteriorate.
- An untrimmed (Mill) edge may contain minor surface discontinuities as a result of the rolling process (refer Clause 7 AS/NZS 3678). It is recommended that a minimum of 50mm be removed from each untrimmed edge.
- Where impact testing is required refer to AS/NZS 3678 - 350L15.

NEAREST OVERSEAS SPECIFICATIONS

ASTM A572-50 ISO 630-E355B JISG 3106-SM490A EN 10025-2-S355JR

For more information contact:

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AS/NZS 3678 - 350

XLERPLATE® steel

CHEMICAL COMPOSITION						
Element	Guaranteed Maximum % ⁽²⁾	Typical % Thickness (mm)				
		5 ≤ t	5 < t < 8	8 ≤ t ≤ 25	25 < t ≤ 80	80 < t ≤ 100 ⁽³⁾
Carbon	0.22	0.155	0.14	0.15	0.09	0.13
Silicon	0.55	0.15	0.20	0.30	0.35	0.45
Manganese	1.70	0.65	1.10	1.20	1.50	1.50
Phosphorus	0.040	0.020	0.020	0.020	0.020	0.020
Sulfur	0.030	0.010	0.010	0.010	0.010	0.003
Aluminium	0.100	0.030	0.035	0.025	0.035	0.035
Micro alloys - Nb ⁽⁴⁾	0.150	-	-	-	0.025	0.015
(when added) - Ti	0.040	-	0.018	0.018	0.018	0.018
CEQ (IIW) ⁽¹⁾	0.48	0.27	0.33	0.36	0.35	0.41

$$(1) \text{CEQ (IIW)} = C + \frac{Mn}{6} + \frac{Cr+Mo+V}{5} + \frac{Cu+Ni}{15}$$

(2) All values shown refer to the relevant Australian Standard unless stated otherwise

(3) Additional Alloys 0.2 Ni, 0.3 Cu

(4) Niobium + Vanadium + Titanium ≤ 0.15%

MECHANICAL PROPERTIES							
Tensile Properties (Transverse)		Thickness Range (mm)					
		5 ≤ t	8 < t ≤ 12	12 < t ≤ 20	20 < t ≤ 25	25 < t ≤ 80	80 < t ≤ 100
Guaranteed Min.	Yield Strength (MPa)	360	360	350	340	340	330
	Tensile Strength (MPa)	450	450	450	450	450	450
	Elong. on 5.65 √ So (%)	20	20	20	20	20	20
Typical	Yield Strength (MPa)	410 - 540	380 - 440	360 - 420	350 - 440	350 - 420	350 - 410
	Tensile Strength (MPa)	480 - 590	470 - 550	470 - 550	470 - 550	460 - 530	500 - 550
	Elong. on 5.65 √ So (%)	20 - 33	22 - 35	23 - 33	23 - 33	25 - 35	25 - 35
Charpy Impact Properties - Longitudinal at -15°C on 10 x 10mm specimen		Absorbed Energy (joules)					
		Avg. of 3			Ind.		
Typical as rolled		50 - 200			30 - 250		

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