

11 March 2014

Mr Adam Yacono
Manager
Anti-Dumping Commission
C/o Australian Customs and Border Protection Service
Customs House
1010 La Trobe Street
DOCKLANDS VICTORIA 3008

For Public File

Dear Mr Yacono

Investigation into Hot Rolled Structural Sections exported from Japan, Korea, Taiwan and Thailand – Response to Submission on behalf of Hyundai Steel

I refer to the letter dated 19 February 2014 on behalf of Hyundai Steel Company concerning comparative products.

It may be inferred from the Hyundai Steel representations that HRS products of Grades SS400 and SM400 are considered like goods by the exporter. The level of redactions (and the accompanying commentary) do not allow the reader to fully understand what grades of HRS it is claimed by Hyundai are in fact 'like goods'. Claims that certain grades of like goods should not be disclosed in Public File documents are misguided – there exists an absence of commercial sensitivity on product grades as it is common for the producer to disclose available grades from local production in company brochures released to the market. OneSteel urges the Anti-Dumping Commission ("ADC") to require exporters to disclose the grades of goods that are produced and sold domestically.

OneSteel seeks to highlight with the ADC that the like goods issue surrounding SM490 product was previously considered during Investigation No. 79 (i.e. HRS exported from Korea). In that investigation, the then Customs and Border Protection was satisfied that the goods were alike and concluded that the exported grade RL (manufactured to AS 3679.1) and the domestic grade HK (manufactured to KS D 3515, with specification SM 490A) ***"to be very similar, and considers the grade HK is the most appropriate for comparison with the exported grade RL"***¹.

OneSteel's representations included in its Exporter Briefing document for Hyundai Steel are thus supported by Customs and Border Protection's assessment in Investigation No. 79 and remain valid for goods exported to Australia during the investigation period of the current HRS inquiry. Hyundai's SM490 grade is a like goods produced and exported to Australia that comply with AS 3679.1.

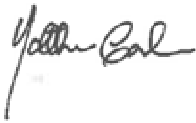
The SS400 and SM400 grades referred to by Hyundai are not considered like goods to HRS manufactured in accordance with AS 3679.1. The SS400 and SM400 grades are of a significantly lower quality in terms of minimum yield strength, one of the key criteria required to meet the AS 3679.1 specifications. It is OneSteel understanding that Hyundai Steel sells its SS400 grade product against lower quality imported Chinese goods (that similarly do not meet the AS 3679.1 specifications).

¹ Refer Trade Measures Report No. 79, P.9.

The SS490 grade referred to by Hyundai is also not considered a like good to HRS manufactured in accordance with AS 3679.1. The SS490 grade has lower yield strength than what is required to meet AS 3679.1 specifications and also doesn't contain tolerances for key elements that govern suitability for welding.

If you have any questions concerning this letter please do not hesitate to contact OneSteel's representative Mr John O'Connor on (07) 3342 1921 or Mr Matt Condon of OneSteel on (02) 8424 9880.

Yours sincerely



Matt Condon
Manager – Trade Development
OneSteel Manufacturing Pty Ltd