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**COMMENTS ON APPLICATION FOR DUMPING DUTIES OF FLAT
ROLLED IRON OR STEEL PRODUCTS THAT ARE PLATED OR
COATED WITH ZINC EXPORTED TO AUSTRALIA FROM INDIA AND
VIETNAM UNDER HS NO.: 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.**

I. Introduction

1. These comments on Application ("Application") which was 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 from India and the Socialist Republic of Vietnam applying for flat rolled iron or steel products that are plated or coated with zinc under HS No.: 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.
2. Hoa Sen Group, on the position of producer of the goods under consideration exported to Australia, clarifies the above Application to Australian Anti-dumping Commission ("Commission") that the facts presented in the Application by BlueScope contains a number of deficiencies since:
 - i. There is no evidence of dumping
 - ii. Lack of grounds for injury due to dumping
 - iii. There has been no of causal link between injury and the alleged "dumped import",

II. THERE IS NO EVIDENCE OF DUMPING

3. The Application fails to show any evidence of dumping as stipulated in Article 2.1 of Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade 1994 ("ADA")

*"For the purpose of this Agreement, a product is to be considered as being dumped, i.e. introduced into the commerce of another country **at less than its normal value**, if the export price of the product exported from one country to another is less than the comparable price, in the ordinary course of trade, for the like product when destined for consumption in the exporting country."*

4. In support of the previous paragraph on what constitutes "dumped product", Hoa Sen Group considers the BlueScope claimed Normal Value and Export price for our goods during the Investigation period of A\$1039, and A\$893 respectively, are baseless and without foundation. Those values are quite incorrect and Hoa Sen Group is submitting its relevant cost and sales data to demonstrate to the Commission that its exports to Australia have not been dumped as alleged by BlueScope in its application.
5. **On the contrary, ss per the submission of the Exporter Questionnaire**, the actual normal value / export price of like goods from Hoa Sen Group of A\$[REDACTED] / A\$[REDACTED] showing that the **export price is actually higher than comparable normal price at A\$[REDACTED]**. In our view, this figure is unable to be construed "being dumped" as Article 2.1 of ADA.
6. We note that, the margin of dumping, as stipulated in Article 5.8 of ADA: *"The margin of dumping shall be considered to be de minimis if this margin is less than 2 per cent, expressed as a percentage of the export price"*, of like goods from Hoa Sen Group much less than 2 (two) percent. Since the submission of Exporter Questionnaire from Hoa Sen Group to the Commission, the calculated margin of dumping is eventually [REDACTED]%. This figure indicates that the **actual margin of dumping has to be considered to be significantly lower than the de minimis. In other word, it cannot be sustained that Hoa Sen Group has "dumped export" of GUC to Australia.**
7. The determination by BlueScope of product specification on **thickness of like goods from Hoa Sen Group exporting to Australia is totally erroneous and inaccurate**. In particular, at Item B-3.1 page 48 of the

Application, BlueScope has stated that *"goods exported from India and Vietnam are understood to be primarily goods of a thinner gauge"*. On the contrary, Hoa Sen Group is exporting like goods with the thicker gauge.

8. Basing on inaccurate information of like goods exporting to Australia as mentioned in 7, BlueScope has explained that *"Galvanised steel of a thinner gauge sells at a higher price due to the higher zinc coating cost when compared with thicker gauge galvanised steel"* and *"to enable a fair comparison between the thicker domestic selling prices and the thinner gauge export prices to Australia, an uplift of the normal value (for the additional cost associated with coating thinner gauge product) is required"* – Please refer to B-3.1 and B-5.1 of the Application. In this case, we sustain that is an **unreasonable uplift, which has been actually calculated twice by BlueScope**: (i) uplift from wrong like goods of thicker gauge selling in Vietnam to wrong like goods of thinner gauge exporting Australia, (ii) uplift from actual like goods of thinner gauge selling in Vietnam to actual like goods of thicker gauge exporting to Australia. **This misleading information pertaining to the thickness obviously inflate the normal value than its own figure and will certainly increase the alleged margin percentage of dumping based on the incorrect information.**

9. Therefore, the thickness adjustment mentioned in paragraph 8 as alleged by BlueScope is quite unjustified. This makes the **alleged normal value to be uplifted substantially by BlueScope**. Moreover, pursuant to Consideration report No.249 of the Application, the Australia anti-dumping Commission stated that ***"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)"***. With the removal of such adjustment by the Commission, it is clearly demonstrated that **BlueScope did not ensure a fair comparison between normal value and export price in its Application.**

In Argentina — Ceramic Tiles, the Panel analysed the meaning of the requirement to make "due allowance in each case at para 6.113 *"Article 2.4 places the obligation on the investigating authority to make due allowance, in each case on its merits, for differences which affect price*

comparability, including differences in physical characteristics. The last sentence of Article 2.4 provides that the authorities shall indicate to the parties in question what information is necessary to ensure a fair comparison. We believe that the requirement to **make due allowance for such differences**, in each case on its merits, means at a minimum that the authority has to evaluate identified differences in physical characteristics to **see whether an adjustment is required to maintain price comparability and to ensure a fair comparison between normal value and export price** under Article 2.4 of the AD Agreement, and to adjust where necessary."

10. Based on the information mentioned in the above paragraphs 3, 4, 5, 6, 7, 8 and 9, Hoa Sen Group submits that there has been no evidence of dumping as defined under Article 2.1 of ADA. The "dumping" in this context is considered as the margin of dumping, which is [REDACTED]%. This margin is significantly less than the allowable 2% of the export price, and it is negligible as provided in Article 5.8 of ADA "An application under paragraph 1 shall be rejected and an investigation shall be terminated promptly as soon as the authorities concerned are satisfied that there is not sufficient evidence of either dumping or of injury to justify proceeding with the case. There shall be immediate termination in cases where the authorities determine that the margin of dumping is de minimis, or that the volume of dumped imports, actual or potential, or the injury, is negligible. The margin of dumping shall be considered to be de minimis if this margin is less than 2 per cent, expressed as a percentage of the export price."

The Appellate Body in *US — Stainless Steel (Mexico)* has found that "Article 2.1 of the Anti-Dumping Agreement defines 'dumping' and 'margin of dumping' have the same meaning throughout the Anti-Dumping Agreement." That "We also disagree with the proposition that the term 'margin of dumping' has a different or special meaning in the context of Article 9.3 of the Anti-Dumping Agreement. As we stated earlier, a margin of dumping measures only the degree or magnitude of dumping. Article 9.3 refers to the margin of dumping as established in Article 2 of the Anti-Dumping Agreement. Article 2.1 of the Anti-Dumping Agreement defines 'dumping', and the opening phrase of that Article makes it clear that the definition applies 'for the purpose of this Agreement'. Therefore, 'dumping' and 'margin of dumping' have the

same meaning throughout the Anti-Dumping Agreement. Article 9.3 does not indicate, either expressly or by implication, that "margin of dumping" has a different meaning in the context of duty assessment proceedings than it does under Article 2"

III. LACK OF GROUNDS FOR INJURY DUE TO THE ALLEGED DUMPING

11. In its Application, we submit that BlueScope has insufficient ground for injury due to the alleged dumping.

In determining the above lack of grounds for injury, Hoa Sen Group analyses the relevant evidences based on:

- The volume of alleged "dumped import",
- The impact of alleged "dumped import" to economic factors and indices to Australian domestic industry on:
 - ✓ potential decline in sales, profits, output, market share, productivity, return on investments, or utilization of capacity;
 - ✓ actual and potential negative effects on employment, wages, growth, ability to raise capital or investments

Such analysis is made in reference to Article 3.1 of ADA which stipulates *"A determination of injury for purposes of Article VI of GATT 1994 shall be based on positive evidence and involve an objective examination of both (a) the **volume of the dumped imports** and the **effect of the dumped imports on prices** in the domestic market for like products, and (b) the consequent impact of these imports on domestic producers of such products."*

12. The indices of sales supplied by BlueScope indicate that there has been no injury to the Australian market. In details, data showed in the Application page 23 that the sales quantities (metric tonnes) for like goods were increased from 83.58 in 2012/2013 to 104.30 in 2013/2014; the index of sales values of like goods were increased from 61.45 in 2012/2013 to 79.57 in 2013/2014. Additionally, BlueScope itself also admits that *"BlueScope's domestic sales of galvanised steel **have recovered following the imposition of measures in February 2013.**"* But *"Whilst it is evident that a sales volume recovery has occurred in*

2013/14, BlueScope's domestic sales revenues remained depressed / suppressed". **This argument is actually a baseless conjecture.**

13. **The Commission also concludes that there is no effect of sales volume and market share to the Australian market.** In the consideration report No. 249 at page 30, the Commission stated: **"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".** And

That **"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."** Please refer to page 31 of the Application.

14. **It is necessary to note that BlueScope has used the unreliable data for determining of import volume.** In details, Consideration report No. 249 at page 19 stated: **"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."** It is a clear indication that the import volume has been inflated in the claimed data of BlueScope. This results in an **inaccurate volume of import goods** which is surely lower than the alleged volume and has resulted in a **misleading determination of injury.**
15. Moreover, the Application and in the Consideration report No. 249 indicated that injury indices of BlueScope showing positive development in year 2013/2014 in comparison with the same figures in year 2012/2013. Hoa Sen Group has also found several grounds illustrating that **BlueScope did not suffer from injury as per provided in Article 3.4 of WTO ADA:** **"The examination of the impact of the dumped imports**

*on the domestic industry concerned shall include an evaluation of all relevant **economic factors** and indices having a bearing on the state of the industry, including actual and potential **decline** in sales, profits, output, market share, productivity, return on investments, or utilization of capacity; factors affecting domestic prices; the magnitude of the margin of dumping; actual and potential **negative effects** on cash flow, inventories, employment, wages, growth, ability to raise capital or investments”.*

16. **Index of production variations** (metric ton) of BlueScope. We note that Bluescope has increased production of galvanized steel in 2013/2014 (96.89) compared to 2012/2013 (81.21).

BlueScope has stated that “BlueScope has experienced **increased production of galvanised steel** following the imposition of anti-dumping measures on exports from China, Korea and Taiwan in February 2013. BlueScope is **not identifying reduced production volumes as an injury indicator**”. Please refer to the Application at page 30.

17. In reference to the Index of price variations (based on A\$ per metric ton) of BlueScope: Bluescope has increased price of galvanized steel in 2013/2014 (76.29) compared to 2012/2013 (73.52).

BlueScope has stated that “The above selling price indices confirm that BlueScope has sustained further selling price reductions in 2012/13 and 2013/14 that have followed as a result of a “**switch**” in export supply to Australia predominantly from China to India and Vietnam”. Please refer to the Application at page 30.

We suggest that the so called “switch” as abovementioned paragraph is **unjustified and baseless**. It is contradicted to the healthier index in 2013/2014.

18. We refer to the Index of profit variations (based on A\$ metric ton) of BlueScope that BlueScope has decreased the loss of galvanized steel in 2013/2014 (-761.80) compared to 2012/2013 (-1469.11).

BlueScope has stated that *"It is BlueScope's contention that the price suppression has been as a consequence of dumped exports from India and Vietnam"*. Please refer to the Application at page 31.

We believe that such price suppression has resulted in profit reduction. On the contrary, this argument is less loss approx. 50% therefore the alleged "dumping" from Hoa Sen Group in particular is baseless. Besides, the Commission comments on BlueScope's profit that **"profit and profitability noticeably improved in 2013-14 (relative to 2012-13"** – Please refer to page 33 of the Consideration report No. 249.

19. Index of revenue variations (based on A\$) of BlueScope that BlueScope has increased the revenue of galvanized steel in 2013/2014 (87.36) compared to 2012/2013 (69.42).

BlueScope has stated that *"The Australian industry's revenue declined in 2012/13 (due to the impact of dumped exports from P R China, Korea and Taiwan during the majority of the year prior to the imposition of measures) and has improved in 2013/14 as BlueScope has increased domestic sales quantities following the full impact of anti-dumping measures"*. Please refer to the Application at page 31.

It is obvious that **import from Hoa Sen Group is neither subject to such impact of anti-dumping measures nor involve in the allegedly declined revenue.**

20. In reference to the index of employment number (number of persons) of BlueScope that BlueScope has increased the employment number directly involved in the manufacture of galvanized steel in 2013/2014 (78.51) compared to 2012/2013 (71.49).

Bluescope has written that *"The above indices for BlueScope's employment numbers directly involved in the manufacture of galvanised steel confirm that the company has experienced a reduction in employees subsequent to 2011/12, with numbers in 2013/14 remaining below the levels of 2011/12 (the investigation period in the inquiry involving galvanised steel exported from P R China, Korea and Taiwan)." Please refer to the Application at page 32.*

It is clear to determine that import from Hoa Sen Group should not be responsible for any employment reduction subsequent to 2011/2012, such investigation period is only related to galvanised steel exporting from PR China, Korea and Taiwan. Additionally, this index of employment number listed in the current investigation period 2013/2014 showed an increase in spite of the alleged "dumped import" from Hoa Sen Group! Therefore, **BlueScope failed to provide any evidence and/or link** for illustrating its alleged "*reduction in employees subsequent to 2011/12*" against Hoa Sen Group.

21. Index of capacity utilisation (metric ton per annum) of BlueScope that Bluescope has increased capacity utilisation of galvanized steel in 2013/2014 (120.03) compared to 2012/2013 (101.74).

BlueScope has claimed that "*In 2013/14, BlueScope experienced an increase in capacity utilisation due to the impact of anti-dumping measures on galvanised steel exports from P R China, Korea and Taiwan. In the absence of antidumping measures, it is considered that BlueScope would have experienced a decline in capacity utilization*". Please refer to the Application at page 32.

Actually, the capacity utilization in 2013/2014 has increased, Bluescope would have experienced a decline in capacity utilization is merely an assumption.

22. For the other economic factors, BlueScope claims its injury against return on investment and employment. However, Commission assesses these factors that "***there has been an improvement in the first half of 2013/2014***".

In general, Commission comments: "*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*". Please refer to the Consideration report No. 249 at page 34.

The Commission added the causes: "*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).*" Please refer to the Consideration report No. 249 at page 34.

We suggest that BlueScope claimed for injury without any evidence and half year data extrapolating to the data of the whole year which indicates that BlueScope has breached the Article 3.7 of ADA "*A determination of a threat of material injury shall be **based on facts and not merely on allegation, conjecture or remote possibility***"

23. **Although not involving in the "so called " injury of BlueScope in the previous years, Hoa Sen Group has found several evidences on media that the alleged injury of BlueScope caused by other non attributed factors as the followings:**

Mr. Paul O'Malley, BlueScope Steel's managing director, speaks to the media following the release in Sydney in August 2012 of the company's full-year results that "*In the year to June, the company took impairment charges on some of its assets, and undertook a restructure as it came **under pressure from the high Australian dollar and slowing demand***". Please refer to <http://www.news.com.au/finance/business/bluescope-optimistic-despite-1b-loss/story-fnda1bsz-1226453934671>.

"*Faced with **weak markets, high raw materials prices** and a **high currency that made exports more expensive**, BlueScope last year pulled out of the export market, slashed jobs and cut half of its steel-making capacity*". Please refer to <http://www.smh.com.au/business/earnings-season/bluescope-steel-annual-loss-tops-1-billion-20120820-24h3u.html>

"*Market analysts at Deutsche Bank are predicting BlueScope will post a half-year loss as **higher coal prices caused by the Queensland floods***" and that "*The price of coking coal, a major ingredient in steel manufacturing, is forecast to continue rising as miners say the floods could disrupt their Queensland operations for more than a month*". Please refer to <http://www.illawarramercury.com.au/story/633845/bluescope-steeled-for-loss-analysts/>

24. On the contrary to claims from BlueScope, in February 2014, there were information that BlueScope has been **on recovery**. *"BlueScope steel has swung **back into the black for the first time in more than three years**, posting a \$3.7 million net profit for the six months to December 31" ... and "BlueScope's **return to profit came from higher sales in Australia**, particularly in the building products segment" and "The company's sales revenue from continuing operations rose 8 per cent to \$3.98 billion for the half, and BlueScope says **many of its divisions managed to increase profit margins on their products**".* Please refer to <http://www.abc.net.au/news/2014-02-24/bluescope-back-in-the-black-on-rising-volumes/5279328>.

IV. AS ILLUSTRATING ABOVE, HOA SEN GROUP SUBMITS THAT THERE HAS BEEN NO EVIDENCE OF DUMPING, AND FURTHERMORE THERE IS A LACK OF GROUNDS FOR INJURY DUE TO THE ALLEGED DUMPING. THEREFORE, THERE HAS BEEN NO OF CAUSAL LINK BETWEEN THE INJURY SUSTAINED AND THE CLAIMED "DUMPED IMPORT"

25. In the event that the Commissioner views differently, Hoa Sen Group maintains that there is **no evidence of a sufficient causal link between the injury and the claimed "dumped import"** as reported by BlueScope in the Application that *"Following the announcement of a formal investigation into BlueScope's application for measures on galvanised steel in October 2012, and the announcement of the PAD on 6 February 2013, there was a noticeable shift in exports from P R China, Korea and Taiwan, to exports from two new source countries – India and Vietnam. Some exports from Korea and Taiwan also continued."* – Please refer to Article A-9. 1 PAGE 33 of Application –. But the fact that, after scrutinizing the PAD on 6 February 2013, Hoa Sen Group found no evidence of such noticeable shift in export from P R China, Korea and Taiwan, to exports from two new source countries – India and Vietnam.

The above so called "shift in export" should be also subject to Article 3.7 of ADA whereby: *"A determination of a threat of material injury shall be based on facts and not merely on allegation, conjecture or remote possibility. The change in circumstances which would create a situation in which the **dumping would cause injury must be clearly foreseen and imminent.**"* As this can be seen, this is clearly not the case.

In the **Panel report, Mexico – Corn Syrup at para 7.132** that: *" In our view, this conclusion is mandated by the language of Article 3.7 of the AD Agreement itself. Moreover, the entirety of Article 3, which serves as context for the interpretation of Article 3.7, supports this conclusion. Article 3 as a whole deals with the determination of injury in anti-dumping investigations, which is defined as material injury, threat of material injury, or material retardation of the establishment of a domestic industry. With respect to the **question of threat of material injury**, we believe an investigating authority cannot come to a reasoned conclusion, based on an unbiased and objective evaluation of the facts, without taking into account the Article 3.4 factors relating to the impact of imports on the domestic industry. These factors all relate to an evaluation of the general condition and operations of the domestic industry – sales, profits, output, market share, productivity, return on investments, utilization of capacity, factors affecting domestic prices, cash flow, inventories, employment, wages, growth, ability to raise capital. Consideration of these factors is, in our view, necessary in order to establish a background against which the investigating authority can **evaluate whether imminent further dumped imports will affect the industry's condition in such a manner that material injury would occur in the absence of protective action**, as required by Article 3.7."*

26. BlueScope provided **no evidence to support its unjustified argument of "the injury experienced in 2013/14 due to the switching of supply sources by importers of galvanised steel to India and Vietnam"**. For the purpose of clarifying the above argument, Commission has explained and commented that :

"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.

BlueScope did not provide unsuppressed selling price (USP) or NIP estimates in its application". Therefore, its argument that the alleged dumping by Hoa Sen Group has caused injury to the Australian industry cannot be sustained on the grounds.

27. With interpretation of non- injurious price / unsuppressed selling price mentioned in above paragrahp 26, it is reasonable to construe that BlueScope would have to furnish further evidences pertaining to NIP of other exporters from Korea, Taiwan, China and other countries causing injury to the Australian industry producing like goods. In reference with Table B-1.5 – Total Export tonnes of galvanised steel to Australia – 2013/14 shows that the total export tonnes of galvanised steel to Australia other than from India and Vietnam accounts for over 75%. Naturally, it is argued that these the quantity from these exporters would be more likely impact on the domestic industry of Australia in comparison to Hoa Sen Group. In the interest of equitable, fairness and transparency, Hoa Sen Group is doubtful of how BlueScope was unable to furnish this important evidence of comparison between NIP and export price in its Application.
28. **We suggest that, Hoa Sen Group has not contributed to any claimed injury of “dumped import” reported by BlueScope in the period 2011/2012 and 2012/2013.** To clarify, the imported volume of like goods from Hoa Sen Group were 175 tonnes in 2011/2012 and 978 tonnes 2012/2013 accounting for 0.06 % and 0.35% of total imports to Australia as listed in the below table:

Country	2011/12	2012/13	2013/14	As % of Total Imports in 2013/14
India	890	3,164	30,596	16.8%
Vietnam	175	978	12,524	6.9%
Taiwan	45,319	79,478	47,135	25.9%
Taiwan (boron)	0	0	8,446	4.6%
China	132,818	115,475	11,675	6.4%
Korea	15,764	18,111	12,391	6.8%
Korea (boron)	0	0	1,073	0.6%
Other	59,237	59,663	57,806	31.8%
Other (boron)	71	172	131	0.1%
Total	254,274	277,041	181,777	99.9%

Table B-1.5 Table B-1.5 – Total Export tonnes of galvanised steel to Australia – 2013/14 at Page 46 of the Application –

It is clear that these volumes are not sufficient to constitute any link between injury and the claimed “dumped import” as per stipulated in Article 5.8 of WTO ADA *“The volume of dumped imports shall normally be regarded as negligible if the volume of dumped imports from a particular country is found to account for less than 3 per cent of imports of the like product in the importing Member”*.

29. Additionally, as reported in the Application, indices for determining of injury to BlueScope has shown its healthy condition as described in the above IV. Thus, Hoa Sen Group also has not found evidence of injury linking to the import by Hoa Sen Group to Australia in 2013/2014. In Guatemala — Cement II, Mexico argued that para 7.118 *“In our view, Article 5.7 imposes a procedural obligation on the **investigating authority to examine the evidence before it of dumping and injury simultaneously**, rather than sequentially, inter alia in the decision whether or not to initiate an investigation. We are of the view that Article 5.7 is not concerned with the substance of the decision to initiate an investigation, which is dealt with in Article 5.3 of the AD Agreement. We note that a previous panel has expressed a similar view on this matter”*

V. CONCLUSION

30. After scrutinizing the Application, Consideration report No. 249 and Hoa Sen Group's facts and figures, Hoa Sen Group comes to conclusion that there has been no evidence of dumping, of material injury and causal link thereof on the alleged dumped import from Hoa Sen Group. Therefore, pursuant to section 269TDA of Part XVB of Customs Act 1901, Hoa Sen Group would like to strongly request that Australian Anti-dumping Commission immediately terminates the current investigation in relation to Hoa Sen Group in Vietnam. *✓*

HO CHI MINH CITY, VIETNAM, AUGUST 23RD 2014

FOR AND ON BEHALF OF HOA SEN GROUP



TRAN NGOC CHU

✓ GENERAL DIRECTOR