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Director Operations 2
Anti-Dumping Commission
GPO Box 1632
Melbourne VIC 3001

**Anti-circumvention inquiry –
Hollow structural sections exported from the Republic of Korea**

Dear Director,

This submission is made by Kukje Steel Co. Ltd (Kukje) in response to allegations by Austube Mills Pty Ltd (ATM) of the occurrence of circumvention activity by exporters of hollow structural sections (HSS) exported from the Peoples Republic of China, Malaysia and the Republic of Korea (Korea). In its application, ATM alleges that Korean exporters have circumvented the dumping duty notice through the slight modification and export of certain electric resistance pipe and tube made of alloy steel (alloy-HSS).

Kukje wishes to make clear that it intends to fully cooperate with the Anti-Dumping Commission's (the Commission) inquiry and request for information. It also wishes to highlight the following facts in respect of its exports to Australia during the inquiry period 1 July 2010 to 31 March 2015.

Prior to and since the imposition of interim dumping duties on exports of carbon-HSS exported from Korea, Kukje can confirm that it has never exported alloy-HSS products to Australia. This is confirmed by previous export sales information submitted to the Commission in respect of [REDACTED] [confidential process] the review of measures which covered the period 1 July 2013 to 30 June 2014. As part of those inquiries, the Commission has been able to satisfy itself that all of Kukje's exports of HSS to Australia were of carbon steel and not alloy steel.

Further, it is noted from the Commission's consideration report that it examined and reviewed declared import information available from the Australian Customs and Border Protection Service. (Customs). Kukje is confident that Customs' database will confirm that it has not exported alloy-HSS products to Australia during the inquiry period. In the event that Customs' database identifies

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isolated instances of alloy-HSS imports, Kukje considers that those import declarations would be the result of inadvertent misclassification rather than actual importations of alloy-HSS.

Yours sincerely

John Bracic