

STAUGHTONS

Independent trade advisory group on anti-dumping & customs issue solutions

Staughtons Pty Ltd – ABN 40 156 647 988
PO Box 4087, Norlane Vic. 3214

Ph +61 (0) 459 212 702
jack@itada.com.au

February 28, 2013

Mr John Bracic
Director, OPS 1
International Trade Remedies Branch
Australian Customs & Border Protection
Canberra ACT 2601

CC: Ms Lydia Cooke

Dear Mr Bracic

Re: ACDN NO. 2013/07
CERTAIN HOLLOW SECTIONS
REINVESTIGATION

ThyssenKrupp Mannex Pty Ltd (Thyssen) ,an Australian importer of certain HSS produced and exported by **URSINE STEEL CO. Ltd**, of TAIWAN requests that the following matters of opinion and claim be taken into consideration in the reinvestigation directed by the Minister .

DETAILS

Case	ACDN No 2013/07 Investigation No. 177
Goods	Certain HSS exports by Ursine Steel Co. Ltd.
Companies	ThyssenKrupp Mannex Pty Ltd (Thyssen) being the importer of HSS from Ursine Steel Co. Ltd. of TAIWAN
Person	M J Howard Authorised Representative of ThyssenKrupp Mannex Pty Ltd.
Contact Details	jack@itada.com.au ph: 0459 212 702
Roles	Thyssen is an importer of HSS. Ursine is an exporter off HSS. Ursine has been treated as a non cooperative exporter.

STAUGHTONS

Independent trade advisory group on anti-dumping & customs issue solutions

Staughtons Pty Ltd – ABN 40 156 647 988
PO Box 4087, Norlane Vic. 3214

Ph +61 (0) 459 212 702
[**jack@itada.com.au**](mailto:jack@itada.com.au)

References

Para 198 of the TMRO report states that exporters that were not selected for investigation “must” be treated as being either a New Exporter or a Residual Exporter.

Requests

On behalf of Ursine Steel Co. Ltd, Thyssen requests the reinvestigation give due consideration to Ursine being treated as a residual exporter in accordance with s 269TG(3B).

Thyssen therefore supports the TMRO recommendation of para 201 that the CEO reinvestigate the dumping duty margin for residual exporters which we claim should include Ursine Steel Co Ltd.

Based on Report No. 177, the current dumping duty margin for Ursine, being categorised as a non cooperating exporter of Taiwan, is 5.3%.

We respectfully request that this rate should be no higher than 2.6%.

Thyssen also supports the Ascertained Export prices being expressed in the currency of the transaction, namely US\$.

Please contact the writer for any clarification.



M J Howard