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**FOR PUBLIC
RECORD**

To The Director
Operations 2 – Anti-Dumping Commission
Department of Industry, Innovation and Science

operations2@adcommission.gov.au

25 November 2015

Submission in response to:

**STATEMENT OF ESSENTIAL FACTS NO 291
Anti-circumvention Inquiry**

**Hollow Structural Sections Exported from The People's Republic of China, The Republic of Korea,
Malaysia, and Taiwan**

Of 5 November 2015

J Steel Australasia Pty Ltd, referenced in the above Statement [REDACTED] herein submits that we have neither imported nor supplied any CHS of alloy steel to Australia or elsewhere.

With regards to the [REDACTED] entries made by [REDACTED] [BUYER] using HTC 7306.50, information provided to us by the Commission (Attachment 1), we advise that these were [REDACTED] shipments under a single contract for which we have attached a sample Mill Test Certificate confirming that materials were of non-alloy steel under the Customs definition (Attachment 2).

If required we can provide MTCs for all [REDACTED] shipments which were of the same product range.

J Steel Australasia confirms that we have advised [REDACTED] [BUYER] of the above as of the date of this letter and requested that the entries be reviewed.

Further, in July & August of this year J Steel's own customs broker has incorrectly used HTC 7306.50 to clear 3 shipments, for which we also attach the MTCs confirming that these were not of alloy steel under the customs definition. These entries were:-

Entry No.	ACLXGRGCG	12/Jul 15	[REDACTED]	- Attachment 3
	ACL7PH9M9	04/Aug 15	[REDACTED]	- Attachment 4
	ACL7PFMPL	04/Aug 15	[REDACTED]	- Attachment 5

all of which we believe should have been entered under code [REDACTED] [ALTERNATE HTC]

We [REDACTED] are in the process of requesting that the above 3 entries be reviewed & amended.

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If we can provide any further evidence or documentation to support our submission that J Steel Australasia Pty Ltd has not been to date nor is currently a supplier or importer of Other Alloy CHS please don't hesitate to contact the undersigned.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'AB', with a long horizontal line extending to the right. A vertical line is drawn through the signature, extending from the 'Yours sincerely,' text above down to the name below.

Anthony Bertrams
Manager Director
J Steel Australasia Pty Ltd