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25 September 2014

Ms Joanne Reid
Director
Anti-Dumping Commission
c/o Australian Customs and Border Protection Service
Customs House
5 Constitution Avenue
CANBERRA ACT 2601

Public File

Dear Ms Reid

Re: Investigation No. 237 - Silicon Metal exported from P R China

Simcoa Operations Pty Ltd ("Simcoa") seeks to highlight with the Anti-Dumping Commission ("the Commission") the grades of silicon imported from the People's Republic of China ("China") throughout the investigation period (2013) and to August 2014.

It is noted that the importer Pacific Aluminium has claimed that Simcoa will not supply a low quality grade 441 silicon for its needs. Simcoa disagrees with this suggestion and can supply like goods from local production. Simcoa draws to the attention of the Commission the import volumes into each state and the varying import prices which are indicative of grades.

Over the period January 2013 to August 2014, approximately [data available from ABS] tonnes of silicon was imported from China¹. The most significant volumes have been entered in Tasmania (refer ABS data) and Victoria (refer ABS data). It is anticipated that some of the volume imported through Victoria is consumed in Tasmania at [entity] smelter. Historically (i.e. for xx years) Simcoa supplied the [location] facility with its Grade xxx silicon. Of the [refer ABS data] imported into Tasmania, approximately [volume] appear to be Grade 441 silicon (price low/high grade cut-off is estimated at \$xxx/MT). The remainder – approximately xx per cent is high grade silicon for use foundry alloy production. For imports into Tasmania, approximately [refer ABS data] are considered to be low grade with the remainder of the total [refer ABS data] considered to be high grade silicon (or xx per cent).

[Entity] facility in Queensland is understood to produce extrusion alloy or billet for aluminium shapes, and lower grade silicon may be used. However, only xxx tonnes of the total [refer ABS data] tonnes appear to be low grade silicon.

Overall, approximately xx per cent of total silicon imports from china over the period January 2013 to August 2014 (inclusive) appears to be low grade silicon.

Simcoa's locally produced silicon can be supplied for all aluminium alloy requirements in Australia. Simcoa does not consider that the Commission should consider any exemption from measures for the dumped and injurious low grade silicon exported from China as this will result in further material injury to the Australian industry in applications where, historically, Simcoa has supplied its locally produced silicon. Simcoa considers that it manufactures like goods to all imported grades of silicon exported from China.

¹ Refer ABS import statistics for January 2013 to August 2014.

If you have any questions concerning this letter, please do not hesitate to contact me on (08) 9780 6762, or Simcoa's Representative, John O'Connor on (07) 3342 1921.

Yours sincerely

Handwritten signature of David Miles, consisting of a stylized 'D' and 'M' followed by 'for'.

David Miles
Vice President
Site Services and Marketing