



11 April 2014

Ms Kerry Taylor  
 Director Operations 3  
 Anti-Dumping Commission  
 1010 La Trobe Street,  
 Docklands Vic 3008  
 Australia

Operations3@adcommission.gov.au

Attention: Kerry Taylor

**For Public File**

Dear Ms Taylor,

**Re: Quenched & Tempered Steel Plate exported from Sweden, Japan and Finland – Proposed Unsuppressed Selling Price**

I refer to the Anti-Dumping Commission's ("the Commission") recent verification visit at Bisalloy Steel Group Limited ("Bisalloy") as part of the above investigation. During the visit, Bisalloy indicated that it would provide a submission to the Commission concerning a preferred methodology for an Unsuppressed Selling Price ("USP") for Quenched and Tempered ("Q&T") Steel Plate sold in Australia during the investigation period.

Bisalloy understands that the Commission's preferred methodology for determining a USP is a market price applicable prior to the onset of injurious dumping. In the absence of a suitable unaffected market selling price, the Minister may consider the Australian industry's costs (plus an appropriate level of profit), or the price of non-dumped imports into Australia during the investigation period.

Bisalloy does not consider that imports from countries other than Sweden, Japan and Finland were in sufficient volume during 2013 to sufficiently influence the setting of market selling prices.

Bisalloy's Confidential Appendix A6.1 data provided with its application for measures included pricing information for the injury periods ending September (i.e. for 2010 to 2013). Prior to the verification visit, Bisalloy updated the data for the October to December 2013 quarter and prepared annual calendar year indices data for 2010 to 2013.

On the basis of the data contained in Bisalloy's updated Confidential Appendix A6.1, it was initially considered by Bisalloy that an USP may be established on Bisalloy's average market selling price for Q&T Steel Plate in Australia during 2012 (i.e. a weighted-average selling price of A\$xxxx per metric tonne). However, Bisalloy's cost-to-make-and-sell ("CTM&S") Q&T Steel Plate [relativity in costs] – by approximately xx per cent. An appropriate USP must reflect the [level] costs of production incurred in 2013 to be adequate to demonstrate a USP.

The return for Bisalloy in 2012 is considered adequate for return on sales purposes (i.e. xxxxx per cent) and is from a period that immediately precedes the investigation period. The [level] unit CTM&S in 2013 was in part due to the [level] production volumes of 2013 caused by dumped imports and a contracting market.

Bisalloy therefore considers that an appropriate USP for the Australian industry must take account of the [level] CTM&S incurred during the 2013 investigation period (when contrasted with 2012). A level of profit that may be applied to the [level], contemporary CTM&S of 2013 from 2012 (i.e. xxxxx per cent) could then be applied to the 2013 cost base to arrive at an USP for 2013.



**Bisalloy Steel  
Group Limited**

The appropriate USP for 2013 therefore is the unit CTM&S of \$xxx per metric tonne, with a xxxxx per cent margin applied (i.e. \$xxx per metric tonne).

If you have any questions concerning this submission please do not hesitate to contact either myself on (02) 4272 0407 Mob: 0406317671 or Bisalloy's Consultant John O'Connor on (07) 3342 1931 Mob: 0411 252 451.

Yours faithfully,

Tom Matinca  
Business Development and Strategy Manager  
Bisalloy Steel Group Limited