

**ADMINISTRATION:**973 MARRIOTT ROAD, WELLESLEY, WESTERN AUSTRALIA 6233
P. O. BOX 1389, BUNBURY, WESTERN AUSTRALIA 6231
TELEPHONE: (08) 9780 6744 FACSIMILE: (08) 9780 6746

14 April 2015

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

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Dear Ms Reid

Investigation No. 237 - Dumping and Subsidisation of Silicon Metal exported from P R China to Australia –

I refer to [company] contentions concerning Simcoa Operations Pty Ltd ("Simcoa") supply of silicon metal. Attached for your consideration is [correspondence] between Simcoa and [company and agency] for the supply of [company] silicon metal requirements. The [correspondence] leading up to and post Simcoa's expansion of its operations in August 2012.

The correspondence also confirms [company] request for [details of request] in the final quarter of 2012 and the first quarter of 2013.

The requests for quotations did not result in a [supply outcome] being provided by [company].

Simcoa is firmly of the view [company] was seeking to have Simcoa match dumped prices ex China. Simcoa's price was considered not attractive enough viz-a-viz Chinese prices and hence [company] elected not to proceed.

Simcoa would reiterate that it should not have to compete with imported dumped grades of silicon metal from China. The Commission's findings in SEF and PAD No 237 confirm that the Chinese goods were exported and dumped and subsidized prices. Simcoa can only compete for the [company] offtake (irrespective of grade) on the basis that the Chinese export prices are not at dumped and subsidized levels.

Simcoa's correspondence of 20 March 2015 confirmed that Simcoa has been supplying Grade xxx silicon metal from its Wellesley facility for over 12 months. The correspondence also indicated that the imported grade of [company] is a Grade 441 [

Comments re comparison between grades of silicon metal]. Irrespective of this, Simcoa can supply varying grades of silicon metal to meet specific customer requirements. Simcoa will not, however, match dumped and subsidized prices that will undermine its overall value proposition to the market.

Simcoa requests the Commission – as proposed in SEF and PAD No 237 - to recommend to the Parliamentary Secretary that anti-dumping and countervailing measures be applied to all grades of silicon metal exported from China to Australia on the basis that the Australian industry manufactures like goods to the exported goods.

If you have any questions concerning the attached submission, please do not hesitate to contact me on (08) 9780 6762, or Simcoa's representative Mr John O'Connor on (07) 3342 1921.

Yours sincerely

A handwritten signature in black ink, appearing to read 'D. Miles', with a long horizontal flourish extending to the right.

David Miles
Vice President
Site Services and Marketing