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1 September 2016

Director Operations 4  
Anti-Dumping Commission  
GPO Box 1632  
Melbourne VIC 3001

**Subsidy investigation into steel reinforcing bars exported from the  
Peoples Republic of China**

Dear Director,

This submission is made on behalf of Jiangsu Yonggang Group Co., Ltd, (Yonggang) in response to the submission made by OneSteel Manufacturing Pty Ltd dated 29 August 2016.

Yonggang does not consider it necessary to respond to the ridiculous and baseless assertions and flawed arguments presented in OneSteel's submission, as there is sufficient reliable information before the Commission to promptly dismiss those views presented as simply untrue and unsubstantiated. In any case, Yonggang provides the following brief comments on certain aspects raised by OneSteel.

Firstly, it is noted that OneSteel questions the finding that Yonggang did not benefit from preferential tax policies without any reasonable basis or any submitted evidence. It simply states that Yonggang is 'likely' to operate '*within the Zhangjiagang Free Trade Zone*' and as such entitled to additional preferential tax policies.

As demonstrated by Yonggang, it was subject to the prevailing company tax rate in China and as such did not benefit from a reduced tax rate or preferential tax policies. Yonggang can also confirm that it is not located within the Zhangjiagang Free Trade Zone. In any case, the applicant's suggestion that being entitled to a program is somehow equivalent to or sufficient for demonstrating receipt of a benefit is simply absurd.

Further, the applicant's suggestion that Yonggang has impeded, misled or provided false information is totally unfounded and should be immediately rejected. For the record, Yonggang has truthfully responded to the Commission's questionnaire and identified all benefits received under the alleged subsidy programs and self-reported numerous additional benefits received under other potential subsidy programs. Based on the

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information submitted by Yonggang in its questionnaire response, the Commission is well positioned to dismiss the applicant's baseless assertions as simply that.

The applicant once again asserts without any supporting evidence that Yonggang is a state-invested enterprise and requests the Commissioner to refer to previously submitted information. The totality of that information appears to be outdated reports from 2007 and 2010, which themselves reference even further outdated sources, articles and historical events. None of the referenced information provides any grounds for the Commission to alter its view that Yonggang is a private enterprise in China.

Yours sincerely

John Bracic