

NON-CONFIDENTIAL - FOR PUBLIC RECORD



Director Operations 3
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Helsinki, 19 June 2014

Investigation 234: Alleged dumping of Quenched and Tempered Steel Plate exported from Finland, Japan and Sweden

REQUEST FOR EXEMPTION

Dear Mr Matthew Williams,

As per Section 8(7) of the Dumping Duty Act goods may be exempt from interim dumping duty or dumping duty if like or competitive goods are not offered for sale in Australia on equal terms under like conditions to all purchasers.

We refer to the visit report (Investigation 234: Alleged dumping of Quenched and Tempered Steel Plate exported from Finland, Japan and Sweden- Visit Report – Australian Industry – Bisalloy Steels) from May 2014.

In particular, referring to Section 3.4 of the Visit Report concerning Bisalloy's manufacturing facilities and product range. It is stated in sub section 3.4.2 – Range of Q&T steel plate:

"Length – Bisalloy stated that it is capable of producing Q&T steel plate to a maximum length of 9.5m, but the standard market offer is 8m" whereas the current investigation is for material up to and including 14m.

Bisalloy representing the Australian industry has by its own admission clearly noted that the Australian industry is not able to produce Goods which length is beyond 9.5 meters and therefore it is a fact that no like or competitive goods are offered for sale in Australia on equal terms under like conditions to all purchasers as regards Goods beyond length of 9.5 meters.

Furthermore, to avoid any suspicion of efforts to circumvent the anti-dumping regulations, Ruukki emphasises that certain customers and certain applications such as transport manufacturing market specifically trailers, bodies etc. absolutely require Q&T plates that are of length over 9.5 meters for their own production process. In these cases, the one piece plate cannot be replaced by e.g. welding two shorter plates together.

Ruukki, therefore, requests the immediate exemption of all Goods (Q&T steel plate) produced greater than 9.5m in length from the scope of the investigation and from any and all interim or other dumping duty.

Should you have any questions relating to this request or the Goods involved we are available for clarification and elaboration.

Yours Sincerely,



Vesa Ruukonen
Senior Legal Counsel
Ruukki Metals Oy