



26 June 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 – Submission by Ruukki Metals Oy of Finland

I refer to the letter dated 19 June 2014 by Ruukki Metals Oy ("Ruukki") seeking an exemption from interim dumping duty on the grounds that certain sized Quenched and Tempered ("Q&T") steel plate is not produced by the Australian industry.

Ruukki is seeking to make a case for an exemption from interim dumping duties for Q&T steel plate above 9.5 metres in length. Ruukki has based this request upon certain contents referred to in the Bisalloy Industry Visit Report where it is reflected that Bisalloy manufactures Q&T steel plate to standard lengths of 8 metres (depending on thickness), including other lengths below and above this up to a maximum of 9.5 metres.

Notwithstanding the above Bisalloy also manufactures non-standard length Q&T steel plate and will readily accept orders for non-standard plate above 9.5 metres in length subject to minimum order quantities and price considerations. Bisalloy provides (confidential attachment) the Commission with an invoiced example of >9.5m length Q&T Steel Plates that we have manufactured and supplied to the Australian Market and therefore does not consider that there exist grounds for an exemption from interim dumping duties on Q&T steel plate as detailed in the Ruukki letter.

Bisalloy also submits that the Q&T steel plate manufactured by the Australian industry is substitutable for a substantial proportion of Q&T steel plate of a length greater than 9.5 metres (i.e. not all end-use requirements stipulate "no welding" of shorter plates.

The goods manufactured by the Australian industry therefore are substitutable for plate exceeding 9.5 metres. Applications for the exemption of interim dumping duty must therefore be considered on a case-by-case basis.

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,

A handwritten signature in black ink that reads 'Tom Matinca'. The signature is fluid and cursive, with a long horizontal stroke at the beginning.

Tom Matinca
Business Development and Strategy Manager
Bisalloy Steels Group Limited