



30 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 – Submissions on behalf of Japanese producers dated 24 & 26 June 2014

I refer to the submissions of 24 and 26 June 2014 on behalf of the Japanese Quenched and Tempered ("Q&T") steel plate exporters Nippon Steel and Sumitomo Metal Corporation, JFE Steel Corporation, and Kobe Steel Limited.

Bisalloy seeks to address a number of items raised on behalf of the Japanese exporters in the nominated correspondence.

Bisalloy respectfully disagrees with the author's assertions that the restructuring announcements of 20 May 2014 are "irrelevant" and outside the considerations of the Anti-Dumping Commission ("the Commission") and the Parliamentary Secretary. Recent decisions (of the Appeal Panel and the then Customs and Border Protection Service in respect of Investigation No.188) do not support the view presented on behalf of the Japanese exporters. The Parliamentary Secretary can have regard for information post the investigation period that is relevant to the imposition of measures.

In relation to the Japanese exporters' representative assertion that *"..it must be assumed that the balance of our client's submissions are not contested"* is not correct. Bisalloy retains the right to respond to any matter in this investigation up until the Commission finalizes its recommendation to the Parliamentary Secretary.

Finally, Bisalloy highlights with the Commission the announcement at the 21 November 2011/2 Annual General Meeting ("AGM") that *'the Australian Q&T market is becoming increasingly competitive because of the influx of overseas competitors'* due in part to *'their relatively weak demand in their home markets'*. Bisalloy did not contend that the import competition was unfairly priced as it was not in a position (at that time) make such a statement (i.e. an investigation had not been commenced by the Commission).

At the 26 November 2013 AGM the Bisalloy Managing Director also noted that *'Throughout FY13 Bisalloy Steels has been under pressure from overseas Q&T steel producers who have continued to target the Australian Q&T market. Pricing is often highly competitive because Australia is used as an outlet for surplus production due to weak demand in their own domestic markets'*

and further that

'In this environment some overseas steel suppliers appear to have unfairly under-priced steel plate imports into the Australian market. BlueScope Steel Limited successfully sought the imposition of dumping and countervailing duties on a number of North Asian manufacturers of Hot rolled steel plate, including manufacturers from Japan, Korea and The Peoples Republic of



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China' and 'There is some commonality between the suppliers covered by the recent Australian Antidumping Commission investigations into hot rolled steel plate and the overseas suppliers of Q&T, and Bisalloy will explore its own options against alleged dumping by various overseas Q&T suppliers'.

It is therefore apparent that Bisalloy has indicated that dumped imports have impacted on the Australian Q&T steel plate market.

If you have any questions concerning this letter 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 Steels Group Limited