

**Directorate General of Foreign Trade**

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Jakarta, March 23, 2015

The Director Operations 3
Anti-Dumping Commission
101 La Trobe Street
MELBOURNE VIC 3002
AUSTRALIA

RE : Report on Statement of Essential Facts No. 240 regarding Australian Anti-Dumping Commission Investigation on Rod in Coils Product from the Republic of Indonesia, Taiwan, and The Republic of Turkey

Dear Sir,

The Government of Indonesia (the GOI) would like to express its concern regarding the Report on Statement of Essential Facts No. 240 released by Australian Anti-Dumping Commission (the Commissioner) on 2 March 2015 with respect to the abovementioned investigation. Furthermore, the GOI would like to convey comments as follow:

1. The GOI would like to express our gratitude to the Government of Australia, specifically to the Australian Anti-Dumping Commission (the Commissioner) for the result on Preliminary Affirmative Determination No. 240 dated on 2 March 2015. Based on the findings in the Statement of Essential Facts No. 240 dated on 2 March 2015, the Commissioner has assessed that Rod in Coils exported to Australia from our exporter, PT. Ispat Indo, were not at dumped prices;
2. Dumping allegation caused serious injury for Indonesian Rod In Coils Industries

The preliminary determination would bring serious detriment to the Rod in Coils industry of Indonesia as well as the cooperative company in this investigation, PT. Gunung Raja Paksi, one of our national leading producer and exporter of Rod in Coils.

3. Rod In Coils exported by Indonesian exporters was negligible

Based on data from www.trademap.org as presented in the table below (see table 1), Indonesian exporters has never exported Hot Rolled Rods in Coils of Steel with HS number 7213.91.00.44 to Australian market in 2012-2013 (during periode of investigation dumping). On the other hand, Hot Rolled Rods in Coils of Steel with HS number 7227.90.90.42 exported by Indonesian exporters to the Australian market is only in small quantity in 2013 (see table 2).

Table 1

List of supplying markets for a product imported by
Australia
Product: 7213910044 Bars & rods of iron/non-alloy steel, of
circular cross section

Exporters	Imported value (US Dollar Thousand)		Imported Quantity (Tons)	
	2012	2013	2012	2013
Belgium	-	-	-	-
Indonesia	-	-	-	-
Malaysia	-	-	-	-
Taipei, Chinese	-	-	-	-
New Zealand	-	-	-	-
Area Nes	50,915	-	58,754	-

Source: www.trademap.org (March, 2015)

Table 2

List of supplying markets for a product imported by Australia
Product: 7227909042 Bars and rods of alloy steel (excl. stainless steel, high speed steel, silico-manganese steel and high alloy steel), hot-rolled, in irregularly wound coils

Exporters	Imported value (US Dollar Thousand)		Imported Quantity (Tons)		Market Share	
	2012	2013	2012	2013	2012	2013
Spain	14,418	13,481	22,504	20,864	96.50%	98.40%
China	505	224	639	125	7.74%	0.59%
Japan	63	37	50	30	0.21%	0.14%
United States of America	31	5	3	1	0.01%	0.00%
Thailand	-	3	-	-	0.00%	0.00%
Germany	149	-	122	-	0.52%	0.00%
New Zealand	-	-	-	-	0.00%	0.00%
Singapore	-	-	-	-	0.00%	0.00%
Netherlands	-	-	-	-	0.00%	0.00%
Sweden	-	-	-	-	0.00%	0.00%
United Kingdom	7	-	1	-	0.00%	0.00%
Korea, Republic of	-	-	-	-	0.00%	0.00%
Macao, China	-	-	-	-	0.00%	0.00%
Taipei, Chinese	-	-	-	-	0.00%	0.00%

Source: www.trademap.org (March, 2015)

The data shows that the share of Indonesian steel in Australian market is negligible. In line with Article 5.8 WTO Anti-Dumping Agreement, the volume of imports from Indonesia for the mentioned product is negligible (less than 3%), therefore the Commission should exclude Indonesia from the investigation.

The GOI appreciates the cooperation of the Commissioner and looks forward to an early response to the above.

Your Sincerely,



Oke Nurwan
Director of Trade Defense

C.c.:

1. Indonesian Ambassador in Canberra, Australia;
2. Director General of Foreign Trade, MoT;
3. Secretary of Directorate General of Foreign Trade.