

8 July 2014

Mr Adam Yacono
Manager
Anti-Dumping Commission
C/o Australian Customs and Border Protection Service
Customs House
1010 La Trobe Street
DOCKLANDS VICTORIA 3008

For Public File

Dear Mr Yacono

**Hot Rolled Structural Sections exported from Japan, Korea, Taiwan and Thailand –
Submission on behalf of Siam Yamoto Steel Co., Ltd of 2 July 2014**

I refer to the submission made on behalf of Siam Yamoto Steel Co., Ltd (“SYS”) of 2 July 2014 recently placed on the Public File.

OneSteel Manufacturing Pty Ltd (“OneSteel”) finds it extraordinary that SYS is seeking to attribute the price undercutting evident from its export sales to the actions of its customer, TKM in Australia. OneSteel submits that it is SYS’s prices that facilitate the dumping and the subsequent injurious impact on the Australian industry.

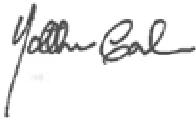
OneSteel is further surprised by SYS’s claim that it is a price-taker in its negotiated prices with TKM. SYS can elect not to export at dumped prices thereby limiting its exposure to anti-dumping claims. SYS has elected not to do this in the current investigation involving HRS exports to Australia. It is also evident from the Commission’s Preliminary Affirmative Determination (“PAD”) No. 223 that SYS’s export prices to Australia attracted the highest dumping margins of all HRS exports the subject of the investigation.

SYS’s attempt to absolve itself of responsibility of its export prices to Australia do not alter the fact that the goods have been exported at dumped prices during the investigation period.

Finally, SYS has suggested that interim duties in a fixed form (*ad valorem* or amount per unit) would be unfair due to SYS’s low export prices during the investigation period. It is OneSteel’s view (at the time of this letter) that a combined (i.e. fixed and variable) approach for measures is considered appropriate to ensure exporters are discouraged from reducing export prices to injurious levels. OneSteel will, however, re-visit this issue following the publication of the Statement of Essential Facts due on 17 July 2014.

If you have any questions concerning this letter please do not hesitate to contact OneSteel's representative Mr John O'Connor on (07) 3342 1921 or Mr Matt Condon of OneSteel on (02) 8424 9880.

Yours sincerely



Matt Condon
Manager – Trade Development
OneSteel Manufacturing Pty Ltd