

**To** Tim King, Investigator - Australian Anti-Dumping Commission  
**From** Andrew Percival  
**Date** 31 August 2015  
**Subject** **Anti-Dumping Investigation - Exports of steel reinforcing bar from Turkey**

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Dear Tim,

We refer to the submission dated 24 August 2015 from Oneteel Manufacturing Pty Ltd in relation to the dumping margin calculation report for our client, Habas Sinai Ve Tibbi Gaziar Istihsal Endustri A.S.

We do not propose to provide a detailed response to OneSteel's submission at this time but will provide our detailed submissions in response to the Commission's statement of essential facts that is due to be published on 2 September 2015.

However, at this time we are instructed to advise that our client disagrees with the submissions of OneSteel and, in particular:-

- outcomes of dumping investigations in other jurisdictions need to be treated with caution and cannot form a basis for drawing conclusions in Australia as they reflect the particular dumping regimes and market circumstances in those jurisdictions. Conclusions reached in anti-dumping investigations in Australia must be based on Australian anti-dumping legislation and the findings of fact made by the Commission. We also note that Onesteel, while referring to a Canadian investigation where Habas's dumping margin was barely above de minimis, conveniently excludes an investigation by the US investigating authorities into Habas's exports of rebar to that country, which concluded just a few months before the conclusion of the Canadian investigation, that Habas was not dumping;
- an on-site verification visit is not the only means by which information provided by an exporter in response to an exporter questionnaire may be tested and verified and OneSteel's submission provides no rational basis for impugning the Commission's verification of information provided by our client; and
- it is evident from the Commission's dumping margin calculation report for our client that it has scrutinised and verified the information provided by our client and based its findings on that factual, verified information.

In the circumstances, it is appropriate that this investigation be terminated in relation to exports from Turkey.

31 August 2015

Australian Anti-Dumping Commission

**Anti-Dumping Investigation - Exports of steel reinforcing bar from Turkey**

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