



25 August 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 – Visit Report – Exporter Ruukki Metals

Introduction

We refer to the above-mentioned verification visit team report and highlight the following matter relating to like goods which the Australian Industry believes may have been incorrectly assessed and reported upon and consequently may impact any resulting measures upon Q&T Steel Plate exports from Finland by Ruukki Metals Oy.

Q&T Steel Plate covered by the Investigation

The Australian Industry's comment to the Anti-Dumping Commission ("the Commission") regarding goods derived from strip product was based upon the understanding that strip product(s) in **TMCP form** were not intended to be covered within the goods under investigation. However, this did not extend to strip product in Q&T steel plate Greenfeed form which the Australian Industry itself utilizes to manufacture the goods for some thicknesses of 4.5mm and greater.

Clearly, any goods which are manufactured from strip Greenfeed product are like goods, and in so far as Ruukki Metals Oy products are concerned these include all RAEX XXX (wear) grades and OPTIM XXXQL that are listed in Tables A-3.3.1 and A-3.3.2 of Bisalloy's Anti-Dumping Application (ADA).

The Preliminary Assessment for Ruukki manufacturing Method 2 is considered by the Australian Industry to include goods under consideration that compete directly with the like goods of the Australian industry – that is, like goods being RAEX 400, 450 and 500 grades of product manufactured from Greenfeed raw material that are then subsequently heat treated in a non-TMCP manner to produce finished Q&T plate steel.

Bisalloy reiterates that the products listed in its application in Tables A-3.3.1 and A-3.3.2, including TMCP steel plate whether in strip or plate form, are substitutable for Q&T Steel Plate in similar end use applications as stated in Bisalloy's application.

Ruukki's claims in relation to like goods produced by Bisalloy – exemptions

Ruukki's comment regarding Bisalloy's ability to manufacture Q&T Steel plate of lengths greater than 9.5m is incorrect and has been addressed in an earlier submission by Bisalloy (submission dated 26 June 2014). Any submissions for exemptions based upon goods that Bisalloy is capable of manufacturing will be addressed accordingly.



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,

A handwritten signature in black ink that reads 'Tom Matinca'. The signature is written in a cursive style with a long, sweeping underline that extends to the left.

Tom Matinca
Business Development and Strategy Manager
Bisalloy Steels Group Limited