



(A Member of The Lion Group)

Our Ref : MGS/ITRB/TL/0748G  
23 October 2012

DIRECTOR OPERATIONS 1  
INTERNATIONAL TRADE REMEDIES BRANCH  
AUSTRALIAN CUSTOMS AND BORDER PROTECTION SERVICE  
CUSTOMS HOUSE  
5 CONSTITUTION AVENUE  
CANBERRA ACT 2601  
AUSTRALIA

Dear Sir / Madam,

**RE : ALLEGED DUMPING OF HOT ROLLED COIL STEEL EXPORTED FROM JAPAN, THE REPUBLIC OF KOREA, MALAYSIA AND TAIWAN**

With reference to the statement of essential facts published on 3 October 2012, we would like to appeal on the preliminary affirmative determination:

- Megasteel only exported 5,741mt of Hot Rolled Coils during the investigation period, which is only about 3% of Australia's total import volume of Hot Rolled Coil compared to Japan, Korea and Taiwan which have exported 24,970mt (approx. 16%), 25,101mt (16%) and more than 67,043mt (42.9%) respectively during this period.

**Export Tonnage of Hot Rolled Steel to Australia (for past 3 years ending March)**

Country	2009/10	2010/11	2011/12
Malaysia	8886	6508	5741
Taiwan	35464	61944	67043++
Japan	29363	63743	24970
Korea	24707	24091	25101

- Megasteel has always maintained self discipline / self constraint on its export quantity to Australia – Furthermore, our Hot Rolled Coil production capacity utilization was only 38.12% during the investigation period which clearly evidenced that we have been consistent in practicing self discipline when exporting to Australia.
- Megasteel's export orders to Australia only go through 2 traders and to restricted end users even though we have been approached by many traders and end users.
- We are more than willing to discuss the designated self discipline control volumes with your authorities concerned.



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- For your information, Australia's export volume into Malaysia in year 2011 (January to December) was more than 25,000mt (4% of total Hot Rolled Coils imports into Malaysia) for Hot Rolled Coil and 52,000mt (6.6% of Cold Rolled Coils imports into Malaysia) for Cold Rolled Coils.
- To date we still have not been able to obtain the actual total imported quantity of Hot Rolled Coils into Australia and our actual percentage during the investigation period.

Yours faithfully,  
**Megasteel Sdn. Bhd.**

**Triston Liew  
General Manager  
Marketing**