

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Thursday, 21 September 2023 1:50 AM  
**To:** Anti-Dumping Commission Investigations 4  
**Cc:** [REDACTED]  
**Subject:** 632 - Railway wheels - Exporter Questionnaire - France  
**Attachments:** [REDACTED]

**Follow Up Flag:** [REDACTED]  
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**Categories:** [REDACTED]

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Dear Sir, Madame,

Please see enclosed MG-Valdunes submission for the above referenced Inquiry.

We have provided as much information as we are able and which we believe can assist your inquiry.

It should please be noted that during the period of the inquiry 01/07/2022 to 30/06/2023 MG-Valdunes did not make any sales in Australia.

Furthermore, MG-Valdunes has made no sales in Australia in the period from February 2018 until 30/06/2023.

We note that the inquiry refers to the sales of “railway wheels used in all user applications have the following typical characteristics:

- 38 inch or 966 mm to 970 mm diameter and of similar overall dimensional tolerances and shape
- manufactured from a high carbon steel with the addition of micro alloying elements to achieve hardness and mechanical properties as defined in the user specifications
- manufactured using a forging and rolling process in accordance with defined standards
- suitable to operate at axle loads above 36 metric tonnes
- a multi-wear rim.

We wish to highlight the fact that we have had no sales of “like” products to any customers, domestic or 3<sup>rd</sup> country during the period of the inquiry or either since February 2018.

We draw your attention to the current situation of our company whereby our current sole shareholder, Maanshan Iron and Steel Company Limited is currently in active negotiations with various parties in order to divest its ownership of MG-Valdunes.

Maanshan Iron and Steel Company Limited is being assisted in this process by Business France Invest, a French government owned organisation.

Further details can be obtained from Mrs Joal Archimède, Business France Invest  
Tél. : +33 (0) 1 40 74 73 77, 77, boulevard Saint-Jacques, 75 998 Paris Cedex 14


In these circumstances the grounds of extending this inquiry into our company are without basis; “The commission also observes that exports of the goods to Australia from France have ceased since the imposition of securities in 2018.7 The commission considers that it is likely that exports from France ceased because the rate of security (and subsequently the rate of dumping duty) imposed on those exports was considerably higher than the rate imposed on goods exported from China, which made the goods exported from France relatively less competitive. Noting that the producers and exporters of the goods in China and France are ultimately owned and controlled by the same company or group based in China, the commission considers that there appear to be reasonable grounds to support Comsteel’s assertion that exports from France may likely resume if the measures expire.”

Regards

Clive OWEN

**MG-Valdunes**

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Further to recent problems, we remind our correspondents that simply sending us an email does not presage either its good reception or its reading by us (media failure, spam device, hacking, etc.).  
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