

13 December 2023

By Email

The Director
Investigation 4
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 260

Dear Director,

RE: Continuation Inquiry 632 – Exports of Certain Railway Wheels from China

I refer to your request for clarification of the railway wheels referred to in Section C of the non-confidential response to the Exporter Questionnaire provided by my client, Baowu Group Masteel Rail Transit Materials Technology Company Limited (**Masteel**).

At **Attachment A** is an extract of Section C to the non-confidential response to the Exporter Questionnaire that has been updated to include the clarification requested of certain redactions. The changes are highlighted for ease of identification.

Also, to reiterate, the railway wheels produced and exported to Australia, as well as sold domestically, are bespoke goods made to the exacting specifications and other requirements of the customer. Hence there are no 'models' as such.

If there are any questions or if further clarification is required, please let me know. No doubt this will be a subject for further discussion during verification.

Yours sincerely,



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Attachment A
Exttact of Section C to the Export Questionnaire

Section C
Exported goods & like goods

C-1 Models exported to Australia

1. Fully describe all the goods your company exported to Australia during the period. Include specification details and any technical and illustrative material that may be helpful in identifying, or classifying, the goods exported to Australia.

RESPONSE:

[Confidential wheel specifications have been redacted]

[Redacted]

Please see [Confidential Exhibit C-1.1](#) for specification details and any technical and illustrative material.

2. Provide a list of all models of the goods exported to Australia. This must cover all models listed in the Australian sales listing in B-2.

- This list must be disclosed in the public record version of the response.

RESPONSE:

The goods exported to Australia include [Redacted].

The railway wheels exported to Australia included XXX970A and XXX970. The "XXX" refers to the customer, which is confidential. The railway wheels were:

(i) [Redacted] produced from continuously cast round billets and undergo manufacturing processes such as sawing, rolling, heat treatment, and processing;

(ii) [Redacted] based on technical conditions and mechanical performance requirements, the steel billet is designed with high carbon micro alloys; and

as such are multiple wear wheels with an axle load of [Redacted] tons and above.

C-2 Models sold in the domestic market

1. Fully describe all like goods (railway wheels) your company sold on the domestic market during the period. Include specification details and any technical and illustrative material that may be helpful in identifying, or classifying, the like goods sold on the domestic market.

RESPONSE:

[Confidential wheel specifications have been redacted]

[Redacted]

The railway wheels sold domestically are XXX970A-QC, XXX9708-QC and XXXQ970G. Again, the "XXX" refers to the customer, which is confidential. These railway wheels are:

XXX970B-QC wheel, made of [Redacted] material, with an inner diameter D1 of [Redacted] mm, an aperture of XXX mm, and a finished weight of [Redacted] kg;

XXX970A-QC wheel, made of [Redacted] material, with an inner diameter of [Redacted] mm and an aperture of [Redacted] mm, and a finished weight of [Redacted] kg;

XXXQ970G wheel, made of [REDACTED] material, with an inner diameter of [REDACTED] mm and an aperture of [REDACTED] mm, and a finished weight of [REDACTED] kg.

Wheel performance requirements:
XXX970A-QC, customer reference for [REDACTED]; The organizational requirement is [REDACTED]

XXX970A-QC, rim tension [REDACTED]; The organization requires [REDACTED];

XXXQ970G wheel, rim tension [REDACTED]; The organization requires [REDACTED]

As noted earlier above, the "XXX" refers to the customer, which is confidential. Redacted (blacked out) information is confidential information concerning specifications of the railway wheels.

Please see [Confidential Exhibit C-2.1](#) for specification details and any technical and illustrative material.

2. Provide a list of models of like goods sold on the domestic market. This must cover all models listed in the domestic sales listing in D-2.
 - This list must be disclosed in the public record version of the response.

RESPONSE:

The goods exported to Australia include [REDACTED] See above responses.

C-3 Internal product codes

1. Does your company use product codes or stock keeping unit (SKU) codes?
If yes:

- (a) Provide details of the product or SKU coding system for the goods, such as a legend or key of the meaning for each code within the product or SKU code.
- (b) Provide a table of showing the product or SKU codes for each type of railway wheel produced and sold.

If no:

- (a) Provide details on the method used to identify the model in the sales and cost spreadsheets.

RESPONSE:

Yes. The Company use product codes.

The coding and matching details are as follows:

Market	Product Code	Product Coding Method	Internal Code of System	Internal Coding Method
Australia	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Domestic	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]