



10 January 2024

The Director, Investigations 2
Anti-Dumping Commission (ADC)
GPO Box 2013
Canberra ACT 2601

Re : Submission on the Initiation of the Continuation Inquiry into Anti-Dumping Measures on Quenched and Tempered Steel Plate Exported from Finland, Japan and Sweden

Dear Director, Investigations 2:

The Japan Iron & Steel Federation (JISF) refers to Anti-Dumping Notice No 2023/084: Initiation of a Continuation Inquiry No 638 into Anti-Dumping Measures on Quenched and Tempered Steel Plate (“Q&T Steel Plate”) Exported from Finland, Japan and Sweden, dated 4 December 2023 (“Initiation Notice”). JISF is a national organization representing the Japanese steel industry, with 114 member companies and organizations, including steel products manufacturers such as Nippon Steel Corporation, JFE Steel Corporation, and Kobe Steel, Ltd., as well as major trading companies that export Japanese steel products. Additional information on JISF is available on our website: < <https://www.jisf.or.jp/en/> >.

Having examined the Initiation Notice and the Application for the continuation of a dumping by Applicant Bisalloy Steels Pty Limited (“Applicant”), JISF would like to submit the following comments and factual information for the Commission’s consideration in the preparation of the Statement of Essential Facts (SEF):

1. The Japanese steel industry’s response to the global steel capacity situation distinguishes it from that of other countries. Specifically, the industry has reduced, rather than increased, capacity and production of steel to focus on core products. The overall trend in capacity reduction is evinced by the OECD’s *Latest Developments on Steel Making Capacity 2023* (July 2023) (“OECD Report”).¹ The OECD Report notes that Japan’s nominal crude steel making capacity decreased by over seven percent from 2010 to 2021, falling from 132 million metric tonnes (mmt) in 2010 to 122.4 mmt by 2021. Capacity remained at that level in 2022.¹
2. During the period that Japan’s nominal crude steel making capacity fell, its production of both ordinary steel and steel plate, which is the narrowest category available that is specific to Q&T Steel Plate, also decreased. According to statistics published by Japan’s Ministry of Economy, Trade and Industry (METI), Japan’s production of ordinary steel and steel plate declined by 20.2 percent and 12.4 percent respectively between 2013 and 2022. JISF provides a summary of METI’s statistics in **Attachment 1**. JISF compiled the statistics from METI’s publicly-available “Current Survey of Production” statistical database, which may be accessed at < <https://www.meti.go.jp/english/statistics/tyo/seidou/index.html> >.

¹ OECD Report at 50 (Table A C.1. Crude Steelmaking capacity developments) is available at < <https://www.oecd.org/industry/ind/latest-developments-in-steelmaking-capacity-2023.pdf> >

3. It is expected that the reductions in capacity and production will continue in the near term. For example, Nippon Steel has announced plans for further consolidation of its steel production in Japan in its Medium- to Long-term Management Plan, dated 5 March 2021 (“Nippon Steel Management Plan”). JISF provides a copy of Nippon Steel’s Management Plan in **Attachment 2**. With regard to steel plate, Nippon Steel announced the closure of two of its four steel plate production lines.² The steel plate production line at its Nagoya Works was closed by the end of the company’s 2021 fiscal year and the line at the Kashima Area of its East Nippon Works is scheduled to be closed during the second half of its 2024 fiscal year.³ The closure of the two steel plate production lines is part of the company’s overall production capacity reduction plans, which includes the reduction of its crude steel production capacity by twenty percent between the 2021 and 2025 fiscal years.⁴

JISF respectfully request that the Commission reflect these facts in the SEF. As demonstrated above, production capacity and production has continued to decrease in Japan over the past decade and there are plans for further reductions in the near term.

Please do not hesitate to contact us if there are any questions on this submission. This submission does not contain confidential information.

Yours sincerely,

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Sakoh

Shuji Sakoh
Managing Director

² **Attachment 2**: Nippon Steel Management Plan at 9.

³ *Id.* The Japanese fiscal year is April to March.

⁴ *Id.* at 16.