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commercial + international

7 May 2024

The Director  
Investigations 2  
Anti-Dumping Commission  
GPO Box 2013  
Canberra  
Australian Capital Territory 2601

By email

Dear Director

## **SSAB - quenched and tempered steel plate from Finland and Sweden Public record submissions – market and industry situation**

Please find attached public record versions of the additional slides that were provided to the Commission today with respect to the *SSAB – CON 638 Australian market and industry situation* submission (placed on the public record on 8 April 2024).

This letter and the attached additional slides may be placed on the public record of the inquiry.

Yours sincerely

**Daniel Moulis**  
Partner Director

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Attachment

**NON-CONFIDENTIAL**



## Distributor price pressure on Bisalloy 8

- ▶ **Example 8** [CONFIDENTIAL TEXT DELETED – date]
- ▶ **German prices in AU market (Dillinger)**
  - German Q&T steel plate offer to [CONFIDENTIAL TEXT DELETED – identifying feature relating to customer] customer of SSAB for [CONFIDENTIAL TEXT DELETED – date] delivery
  - Trader/importer [CONFIDENTIAL TEXT DELETED – identifying feature relating to seller]
  - Dillinger has built up its market share in Western Australia and [CONFIDENTIAL TEXT DELETED – identifying feature relating to seller] is now increasing sales into eastern Australian markets
  - Dillinger product is of a higher quality reputation than commodity Q&T steel plate
  - Graphical information on next slide compares price offer of German Q&T steel plate with SSAB's [CONFIDENTIAL TEXT DELETED – description of pricing model]
  - On average, SSAB [CONFIDENTIAL TEXT DELETED – description of pricing model] prices for Strenx are demonstrated to be up to [CONFIDENTIAL TEXT DELETED – number] % higher than the German Q&T steel plate on individual thickness basis and [CONFIDENTIAL TEXT DELETED – number] % higher on average across all thicknesses
  - Note: price terms are DDP ex-port warehouse AND delivery to customer location is to [CONFIDENTIAL TEXT DELETED – identifying feature relating to seller] account

[CONFIDENTIAL INFORMATION DELETED – COPY OF OFFER REFERENCED IN EXPLANATION OF SAME]

[CONFIDENTIAL INFORMATION DELETED – DETAILS OF SELLER]

14C NON-CONFIDENTIAL – PUBLIC RECORD VERSION

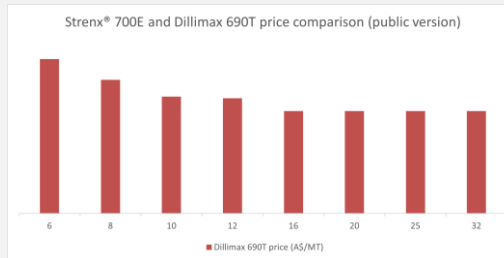


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## Distributor price pressure on Bisalloy 8 continued

- ▶ **Example 8** [CONFIDENTIAL TEXT DELETED – date] continued
- ▶ **Germany prices in AU market (Dillinger)**
  - Note that these comparisons are based on SSAB's [CONFIDENTIAL TEXT DELETED – description of pricing model]
  - [CONFIDENTIAL TEXT DELETED – description of pricing model] constituting [CONFIDENTIAL TEXT DELETED – expression of degree and number] % of SSAB's sales over the last 12 months
  - [CONFIDENTIAL TEXT DELETED – description of pricing model] higher prices
  - Dillinger steel plate has a higher-quality reputation than other sources (sources other than SSAB)
  - This and all other evidence we have provided clearly establishes that:
    - o price offers such as this are being made all over the market, from multiple sources;
    - o they hugely undercut SSAB [CONFIDENTIAL TEXT DELETED – description of pricing model] pricing; and
    - o they impact on whatever price ambitions the already profitable Bisalloy may have, and will continue to impact the Australian market in the future



[CONFIDENTIAL BARS DELETED – non-confidential commentary as follows:  
1. Bars showing lowest example SSAB prices removed  
2. At all points SSAB prices exceed seller prices]

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