

24 May 2024

Director  
Investigations 2  
Anti-Dumping Commission  
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Canberra ACT 2601

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## Public File

Dear Director,

### **Continuation No. 638 – Bisalloy comments on SSAB Sweden verification representations**

Bisalloy Steel Pty Ltd (**Bisalloy**) refers to recent submissions by SSAB EMEA AB (**SSAB EMEA**) regarding Australian market competition. Bisalloy submits that SSAB EMAE continues to make misleading representations, rebuttals against which can be dealt with in short order as follows.

#### **23 April 2024 submission – Distributor price pressure on Bisalloy 7**

SSAB EMEA provides an example of a Chinese Q&T steel plate offer and spruiks that its prices for the Hardox and Strenx products have been, on average, higher. The majority of this two-slide example is dedicated to this price comparison, with the final two bullet points continuing to purport that Bisalloy operates in a different market segment. This line, alongside SSAB EMEA's claim that it holds and owns rarefied sole occupancy of a premium Australian market segment, has been admonished in an earlier submission by Bisalloy.

On the specifics of this example however, Bisalloy notes that [**confidential text deleted: Bisalloy's assessment of the example details**]. The relevance here is that Bisalloy has not sought to compete against such prices. Refer Confidential Attachment 1 for further details.

#### **7 May 2024 submission – Distributor price pressure on Bisalloy 8**

Similar to the above, this example pitches SSAB pricing against a German Q&T steel plate offers. Bisalloy disagrees with the claim by SSAM EMEA that this exporter has grown market share in Western Australia and the eastern markets. This can be readily assessed by the Commission.

Bisalloy notes that Australian processors order very limited quantities of thick plates which would exceed Bisalloy's capability. Often, import packages are bundled and will include some lower thickness plates. The prevalence of the example provided is not pervasive, nor is Bisalloy competing against such prices. Refer Confidential Attachment 2 for further details.

If you have any questions concerning this submission, please do not hesitate to contact Bisalloy's representative Mr Chad Uphill on +61 (2) 412 377 603.

Yours sincerely,

Carl Bowdler  
Chief Financial Officer