



J.BRACIC & ASSOCIATES
TRADE REMEDY ADVISORS

PO Box 3026
Manuka, ACT 2603
Mobile: +61 499 056 729
Email: john@jbracic.com.au
Web: www.jbracic.com.au

18 May 2017

Director Operations 2
Anti-Dumping Commission
GPO Box 1632
Melbourne VIC 3001

**Dumping investigation into alloy round steel bars exported from the
Peoples Republic of China**

Dear Director

This submission is made on behalf of Donhad Pty Ltd (Donhad) in response to the position paper issued by the Anti-Dumping Commission (the Commission) on 4 May 2017.

Scope of goods

Donhad notes the Commission's preliminary view that grinding bar does not possess characteristics sufficiently different from engineering and spring steel to consider them separate distinct goods. Whilst Donhad disputes this view based on its comprehensive knowledge and understanding of grinding bar and the grinding media market, it is encouraged by the Commission's recognition that they '*are distinct segments of the alloy round bar market and will each be analysed for the purposes of injury assessment.*'

Scope of Australian industry

Following identification of the scope of goods, the determination required to then be made is identification of the Australian producers of like goods. Whilst it is noted that the Commission's position paper does not address this specific issue, Donhad reiterates its view that the applicant is not a manufacturer of grinding bar and that the sole producer of grinding bar in Australia during and since the investigation period is Commonwealth Steel Company Pty Ltd (Moly-Cop).

Yours sincerely

John Bracic