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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 recent submission by OneSteel Manufacturing Pty Ltd (OneSteel) dated 14th September 2017.

Donhad welcomes the Anti-Dumping Commission's (the Commission) decision to extend the deadline for publication of the preliminary findings in the alloy round bar dumping investigation. The extension provides further opportunity for the Commission to gather relevant information surrounding the composition of the Australian industry producing like goods, and the degree of competition between locally produced like goods and comparable imported goods. As noted in Donhad's original submission of 3 February 2017, identification of the Australian industry members and in particular the domestic producer of grinding bar, is critical to ensuring the Commission undertakes a meaningful injury and causal link assessment.

It is noted that the primary reason for this third extension is:

to enable the Commission to obtain and verify appropriate data and information from the Australian industry. The Commission received information from the Australian industry that shows the existence of complex relationships between interested parties. In addition, submissions have identified difficulties in obtaining evidence on material facts that are in contention, which require further analysis.

Given the uncertainty and complexity surrounding the issues identified by the Commission, and until such time as it receives and verifies the information requested of Moly-Cop Pty Ltd, the Commission will not be in a position to thoroughly consider, assess and determine the material facts of the contested issues. In these circumstances, Donhad submits that the Commissioner cannot

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reach the level of satisfaction required to consider that sufficient grounds for the publication of a dumping duty notice exists.

Therefore, Donhad rejects OneSteel's assertion that grounds currently exist for the publication of a preliminary affirmative determination. OneSteel's view plainly overlooks the importance of information requested from Moly-Cop and the impact that such information may have on the composition of the Australian industry and material injury claims presented in OneSteel's application.

Yours sincerely

John Bracic