

10 September 2018

Director – Investigations 1
Anti-Dumping Commission
Level 35, 55 Collins Street
Melbourne VIC 3000

Investigation 384 - Alleged dumping of alloy round bar exported to Australia from the People's Republic of China

Dear Mr Piper,

This submission is made in response to the Commission's recently published File Note dated 4 September 2018 in which the Commission advises that it has requested the following information from Liberty OneSteel and Moly-Cop by Thursday the 13th of September.

- alloy round bar rolling arrangements between Moly-Cop and Liberty OneSteel
- supply of alloy round bar by Liberty OneSteel to Donhad Pty Ltd
- supply of alloy round bar by Moly-Cop to Donhad Pty Ltd

In addition to providing the requested information by the 13th of September, Liberty OneSteel believes that it is critical for the Commission, if it hasn't already done so, to validate Moly-Cop's claims in its submission dated the 1st June 2018 that

Irrespective of this, it is now clear that Donhad will secure its raw material grinding bar requirements from Moly-Cop, thereby removing any supply from OneSteel Manufacturing. [emphasis added]

... Moly-Cop will now supply all of Donhad's grinding bar requirements **from its rolling-bar facilities**.

Therefore, additional enquiries that needs to be made of Moly-Cop and Donhad are:

- the volume and value of imported grinding bar consumed by Moly-Cop and/or Donhad since the conclusion of their merger on 30 April 2018, whether or not imported directly or via third-party importers;
- the volume and value of forward orders for grinding bar from imported sources, not yet delivered.

If either Donhad or Moly-Cop have placed orders for imported product that are subject to the investigation post their merger on the 30th April 2018, then it would invalidate Moly-Cop's claims and would demonstrate that material injury as a result of dumping is continuing to occur. As such Liberty Onesteel requests that the Commission seek this clarification from Moly-Cop and Donhad, in addition to performing ongoing an examination of the ABF import database following the conclusion of the investigation period.

For and on behalf of the applicant

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