

30 January 2019

Ms Carina Oh  
Case Manager  
Investigations 2  
Anti-Dumping Commission  
Level 35  
55 Collins Street  
MELBOURNE VIC 3001

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**Public File**

Dear Ms Oh

**Re: Anti-Circumvention Investigation No. 483 – Wire Rope Exported from South Africa – Haggie Reid Pty Ltd Importer Verification Report**

**I. Introduction**

I refer to the importer verification report for Haggie Reid Pty Ltd (“Haggie Reid Report”) recently placed on the EPR (refer EPR document No. 017).

BBRG Australia Pty Ltd (“BBRG Australia”) takes this opportunity to correct and clarify statements included in the Haggie Reid Report. BBRG Australia notes that a number of issues that BBRG Australia identifies as concerns have previously been addressed by BBRG Australia. These are briefly re-visited below.

**II. Physical characteristic claims of a 6, 8 and 9 strand rope**

In submission dated 9 October 2018 BBRG Australia detailed rope physical characteristics of a 6, 8 and 9 strand wire rope in response to “Scaw Metals/Haggie Reid Product Difference and Market Perceptions” contained in the Scaw/Haggie Reid submission dated 1 October 2018.

BBRG Australia rebutted the statements contained in Haggie Reid Report at Section 6.1 in its 1 October 2018 submission (refer BBRG Australia submission dated 9 October 2018).

BBRG Australia does not consider it necessary to repeat the statements made at Section VI. Of its 9 October 2018 submission. The essential characteristics as represented by the physical properties of 6, 8 and 9 strand wire ropes referenced by BBRG Australia remain unaltered.

**III. BBRG Australia submission of 19 November 2018**

In the above referenced submission BBRG Australia states at Section III that it does not wish to engage in an ongoing debate about the goods and the circumvention goods. BBRG Australia has stated in a number of submissions to the Anti-Dumping Commission (“the Commission”) that it manufactures goods that are alike to the circumvention goods (refer submissions including those dated 9 October 2018 and 9 and 19 November 2018).

BBRG Australia considers it has demonstrated that the circumvention goods are alike to the goods the subject of the notice.

**IV. Section 6.11 of Haggie Reid Report**

At Section 6.11 of the Haggie Reid Report the following statement appears:

*“Haggie Reid also claimed that the Australian industry has lowered the price of its six and eight strand wire ropes since the anti-dumping measures were imposed and they perceive this pricing behavior indicates no injury to the Australian industry in the first place.”*

This statement is incorrect. BBRG Australia has sought to increase prices following the successful anti-dumping measures imposed on the goods following Investigation No. 401. However, with the introduction of the circumvention goods by Haggie Reid (i.e. the “innov 9” marketed goods), BBRG Australia has been unable to recover its pre-injurious pricing position due to the dumping of the circumvention goods.

Confirming this position, BBRG Australia has contrasted price increases at [details re supply to customer] with increases in the international price of high carbon rod. It is evident that BBRG Australia has been unable to recover the cost increases during 2018 due to the availability of the dumped circumvention goods in the Australian market. Please refer Confidential Attachment 1.

**V. Conclusion**

BBRG Australia is concerned by the matters contained in the Haggie Reid Report asserting inaccuracies that are not supported by available evidence. This submission addresses those inaccuracies and corrects the public record accordingly.

If you have any questions concerning this submission, please do not hesitate to contact me on (02) 4968 5000 or BBRG Australia’s representative, Mr John O’Connor on (07) 3342 1921.

Yours sincerely



**Stuart Callender**  
Vice President – Oceania