

6 December 2019

The Director
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

BY EMAIL:
investigations3@adcommission.gov.au

Dear Director,

Resumed Dumping Investigation No. 495A concerning steel reinforcing bar (rebar) exported from the Republic of Turkey (Turkey)

AUSTRALIAN INDUSTRY SUBMISSION

InfraBuild (Newcastle) Pty Ltd (**InfraBuild Steel**), formerly *Liberty OneSteel* (Newcastle) Pty Ltd, the applicant and a member of the Australian industry producing like goods to the goods the subject of the application subject to *ADRP Decision No. 110*, makes the following comments and observations concerning the impending resumed investigation.

Basis for the resumption of the investigation

Panel Member O'Connor in ADRP Decision No. 110 found that the Commissioner erred in the determination of normal values and that such an error removed the foundation for the Commissioner's decision that the dumping margins did not exceed the negligible margins determined. The Panel Member summarised the key issue as follows:

In the present case, the Commissioner, through the application of the first stage of this sufficiency test, confirmed the presence of large volumes of like goods sold on the domestic market. The Commissioner did not test whether such sales could form the basis for the determination of normal values i.e. whether such sales had been made in arms length transactions and were in the ordinary course of trade. Such an examination was not thought to be necessary as a result of the application

of the second stage of the sufficiency test with its focus not upon like goods but upon comparable models.¹

The Panel Member elaborated further stating that:

*..... practical difficulties in determining an appropriate adjustment cannot operate to exclude sales of like goods available for consideration under s.269TAC(1), for the purposes of s.269TAC(2)(a) or (b). The legislation goes some way to address such difficulties by requiring investigating authorities to make adjustments for differences and by providing a fallback position where such adjustments cannot practicably be made. In such circumstances the Minister may determine normal values by having regard "to all relevant information."*²

1. Adjustment for grade specification differences

In Termination Report 495 (**TER 495**), the Anti-dumping Commission (**Commission**) provides the following:

*In the case of Colakoglu, Diler, Habas and Kroman, there were quarters where there were no sales of like goods on the domestic market that would be **relevant** for the purpose of determining a price under subsection 269TAC(1). This occurred because of the different grades each exporter sold to the respective markets. The grades are relevant to the MCC category of minimum yield strength.*

*For context, all of the goods exported to Australia were of minimum yield strength sub-category C (greater than 480MPa but less than 550 MPa). In contrast, **only one per cent of like goods sold in the OCOT in Turkey as verified for the cooperating exporters in this investigation were of minimum yield strength sub-category C.** Almost all of the remaining domestic OCOT sales were minimum yield strength sub-category B (greater than 300 MPa but less than or equal to 480 MPa).³ [emphasis added]*

Clearly a significant challenge facing the Commission in INV 495 was the finding; based on the information provided by the exporters; that the majority (99%) of the domestic like goods (sold in OCOT) are grades having a minimum yield strength lower than the minimum yield strength of the goods exported to Australia.

The Commission recently introduced Model Control Codes (**MCC**) with the aim of imposing "a discipline on the selection of characteristics that will be used to identify the most closely matching models of the goods sold for export to Australia and like goods sold domestically in the country of export"⁴.

The Commission further stated the policy supporting the use of MCCs

In determining the MCC structure, the Commission will have regard to differences in physical characteristics. In assessing the materiality of the differences in physical characteristics, the

¹ ADRP Decision No. 110 p17 at para 34

² ADRP Decision No. 110 p18 at para 36

³ TER 495 at p45

⁴ ADN 2018/77 Consultation on the Introduction of Model Control Codes at p1

Commission may take into account differences in unit costs and unit prices attributable to those different physical characteristics.⁵

As such, the MCC structure was intended to provide information useful for identifying and quantifying adjustments for non identical goods as required by 269TAC(8):

Where the normal value of goods exported to Australia is the price paid or payable for like goods and that price and the export price of the goods exported :

.....

*b) are **not** in respect of **identical goods** or*

.....

*that price paid or payable for like goods is to be taken to be such **a price adjusted** in accordance with directions by the Minister so that those differences would not affect its comparison with that export price.*

The Commission's proposed model control code structure for INV 495 is reproduced below.

Appendix 1 to ADN No. 2018/175 – Proposed Model Control Code Structure

The Commission proposes to apply the following MCC structure in relation to Investigation No. 495, regarding exports of rebar to Australia from Turkey.

Item	Category	Sub-category	Identifier	Sales data	Cost data	Key category
1	Prime	Prime	P	Mandatory	Optional	Yes
		Non-Prime	N			
2	Minimum yield strength specified by product standard (Mega Pascals or "MPa")	Less than or equal to 300	A	Mandatory	Mandatory	No
		Greater than 300 but less than or equal to 480	B			
		Greater than 480 but less than 550	C			
		Equal to or greater than 550	D			
3	Finished form	Rebar in length/straight	S	Mandatory	Mandatory	No
		Rebar in coil	C			
4	Nominal diameter (millimetres or "mm")	less than 12	A	Mandatory	Optional	No
		Greater than or equal to 12 and less than or equal to 16	B			
		Greater than 16 and less than or equal to 32	C			
		Greater than 32	D			
5	Length (metres or "m")	less than or equal to 6	1	Mandatory	Optional	No
		Greater than 6 and less than or equal to 12	2			
		Greater than 12	3			
		Coil product	C			

As an example of how goods will be classified using this MCC structure, prime rebar of 500 MPa, in straight form, with a diameter of 12 mm, and a length of 10 metres, would receive the MCC P-C-S-B-2.

InfraBuild Steel observes that the Commission felt it was unable; in the absence of sufficient yield strength sub-category C domestic sales; to apply an adjustment for grade specification differences between sub-categories "B" and "C" sold in the Turkish domestic market. The Commission further cited an "*absence of other information which may have been relevant to quantifying the price difference between sub-category B*

⁵ ADN 2018/77 at p4

and sub-category C on the Turkish domestic market, for example **price lists** or market reports”⁶. [emphasis added]

InfraBuild Steel brings to the Commission’s attention a confidential attachment referenced by Turkish exporter Kroman Celik in their questionnaire response which appears to be a price list for a Turkish rebar producer:

*Please see **Exhibit C-3.1.2 for the price list for ICDAS Iron and Steel. The price components are grade and diameter**.*⁷ [emphasis added]

This reference suggests that a price list **has** been provided to the Commission for another domestic Turkish rebar producer which shows differentiation of price based on grade which may constitute relevant information for an adjustment between domestic like goods and the export goods ie. sales of rebar grade with minimum yield strength of 420MPa (domestic grade) and rebar grade with minimum yield strength 500MPa (the export grade).

2. Sufficiency of Turkish domestic sales to sub-category C

We observe that the Commission’s current view is that “*only one per cent of like goods sold in the OCOT in Turkey... were of minimum yield strength sub-category C*”. If this view is correct, then InfraBuild Steel estimates that during the period of investigation (POI) ie. 1 October 2017 to 30 September 2018, where approximately ██████t of rebar in straight lengths and coils (having minimum yield strength of 500 MPa) was exported from Turkey to Australia, then less than ██████t of rebar sold into the Turkish domestic market by these exporters were like goods having a minimum yield strength of 500MPa.

Two of the exporters, namely Habas and Diler (DDC), in their questionnaire responses⁸ reported no domestic sales of sub-category C rebar.

Habas sold the following MCCs in the domestic market.

- P-A-C-A-C
- P-B-C-A-C
- P-B-C-B-C
- P-B-S-A-2
- P-B-S-B-1
- P-B-S-B-2
- P-B-S-B-3
- P-B-S-C-1
- P-B-S-C-2
- P-B-S-C-3

⁶ TER 495 at p45

⁷ EPR 495 Folio No. 009 at p14.

⁸ EPR 495 Folio No. 008 at p31 and Folio No. 10 at pp22-23.

DDC sold the following MCCs for the prime products in the domestic market:

P-B-S-A-2	P-D-S-B-2
P-B-S-B-2	P-D-S-C-2
P-B-S-C-2	P-B-S-A-1
P-B-C-A-C	P-D-C-A-C
P-B-S-D-2	P-A-S-B-2
P-B-C-B-C	P-A-S-A-2
P-B-S-C-1	P-B-S-B-3
P-B-S-B-1	
P-D-S-A-2	

Perplexingly, Diler reported its trading arm (DDT) selling only grade “D” reinforcing bar (that is, equal to or greater than 550MPa minimum yield strength; as per relevant Standard specification) for export to Australia. This is very unlikely as the commonly used grade in Australia is “500N”, which by its very designation denotes a steel with minimum yield strength of 500MPa ie. Clearly a sub-category “C” rebar.

DDT exported to Australia the following MCCs:

~~P-D-S-B-1~~
~~P-D-S-B-2~~
~~P-D-S-C-1~~
~~P-D-S-C-2~~
~~P-D-S-D-2~~

Whilst no further information is provided in Diler’s verification report about the methodology followed, the report shows that either Diler provided very different sales model information at verification (compared to what had been provided in their questionnaire response) or the verification team revised the sales data provided to them as evidenced by the extracts⁹ below. Following the revision of the MCCs we note that domestic sales of grades “A” and “D” had disappeared from the models with a single grade “C” sale of coil included in the domestic grade “B” MCCs for this exporter and the domestic sales models reported had reduced in number from sixteen to seven. The verification report for Diler now showed all five export models having grade “C” designation.

⁹ EPR Folio No. 495/027 at pp6-7

Diler sold like goods on the domestic market with the following MCCs detailed in ADN No. 2018/175 during the period:

- P-B-S-A-2
- P-B-S-B-2
- P-B-S-C-2
- P-B-S-D-2
- P-B-C-A-C
- P-B-C-B-C
- P-C-C-A-C
- Non-prime mixed lengths in straight and coil form

Diler exported the goods to Australia with the following models control codes (MCCs) detailed in ADN No. 2018/175 during the period:

- P-C-S-B-1
- P-C-S-B-2
- P-C-S-C-1
- P-C-S-C-2
- P-C-S-D-2

Whilst no modification of MCCs is apparent between questionnaire responses and verification reports for either of the exporters (Habas or Colakoglu) that were not subject to an in-country visit, the Commission also appears to have allowed or made changes to the domestic sales' MCC information for the other Turkish exporter subject to an in-country verification ie. Kroman Celik (Kroman).

Kroman's verification report referenced the following (revised) MCCs list¹⁰, which included five models of "non-prime" sales not previously included in their questionnaire response. The reasons for designating these sales as "non-prime" models is not clear from the verification report as they are not "non-prime mix lengths in straights" separately listed (i.e. they are in coil form), and have seemingly been given a minimum yield strength designation (A, B or C) :

Kroman sold like goods on the domestic market with the following MCCs during the investigation period:

- N-A-C-B-C, N-B-C-A-C, N-B-C-B-C, N-C-C-A-C, N-C-C-B-C
- P-A-C-A-C, P-A-C-B-C, P-A-S-A-2, P-A-S-B-2, P-A-S-C-2
- P-B-C-A-C, P-B-C-B-C, P-B-S-A-1, P-B-S-A-2, P-B-S-B-1, P-B-S-B-2, P-B-S-B-3, P-B-S-C-1, P-B-S-C-2, P-B-S-C-3, P-B-S-D-2, P-B-S-D-3
- P-C-C-A-C, P-C-C-B-C, P-C-S-A-2, P-C-S-B-1, P-C-S-B-2, P-C-S-B-3, P-C-S-C-2, P-C-S-C-3, P-C-S-D-2
- Non-prime mix lengths in straight

InfraBuild Steel is unable to reconcile the lack of grade "C" sales (grade) data provided by the exporters in relation to the Turkish domestic sales grades and the resulting findings of the Commission in INV 495 with the information provided by (some of) the same exporters and findings determined in investigations

¹⁰ EPR Folio No. 495/026 at pp6-7



concluded by investigating authorities in Malaysia and the United States. In other words, it is InfraBuild Steel’s view that contrary to the exporters’ assertions, there could not have been only [redacted] of like goods designated to sub-category “C” sold into the Turkish domestic market during the POI.

2.1 Malaysia

The Investigating Authority (IA), Trade Practices Section, Ministry of International Trade and Industry (MITI) on 5th September 2019 published their Preliminary Determination Report in relation to Case No. AD02/2019 Anti-dumping investigation concerning imports of steel concrete reinforcing bar products originating or exported from the Republic of Singapore and the Republic of Turkey¹¹.

The period of investigation for the Malaysian investigation was identical to that for INV 495, i.e. 1 October 2017 to 30 September 2018.

The Malaysian authority made the following observation regarding export merchandise requirements “in order to be sold in Malaysia.”¹²

29. The IA noted that the subject merchandise is required to fulfil the Malaysian Standard specifications in order to be sold in Malaysia. The product specifications of High Yield Deformed Bar/Deformed Reinforcing Steel Bar according to MS146:2014 are as follows:

Standard	Chemical Composition, %						Mechanical Properties			Former Diameter	
	[Cast analysis]						Min. Yield Stress [N/mm ²]	Tensile Strength [N/mm ²]	Min Elongation on Gauge Length [Lo], %	Bend Test 180°	Rebend Test
C	P	S	Cu	CE	N ₂						
MS 146:2014 [Grade:B500A]	0.22 max	0.05 max	0.05 max	0.8 max	0.50 max	0.012 max	500-650	5% greater than actual yield stress (2% d< 8mm)	2.5*	N/A	4d [d ≤ 16] 7d [d > 16]
MS 146:2014 [Grade:B500B]	0.22 max	0.05 max	0.05 max	0.8 max	0.50 max	0.012 max	500-650	8% greater than actual yield stress	5*	N/A	4d [d ≤ 16] 7d [d > 16]
MS 146:2014 [Grade:B500C]	0.22 max	0.05 max	0.05 max	0.8 max	0.50 max	0.012 max	500-650	≥15%, <35% greater than actual yield stress	7.5*	N/A	4d [d ≤ 16] 7d [d > 16]

Note that all three grades determined by the Malaysian authority to be eligible for sale to Malaysia have a minimum yield strength Standard specification of 500MPa (sub-category “C” for the purposes of INV 495).

In consideration of like or identical goods sold in the domestic markets of the exporting countries, the IA determined the following¹³:

¹¹ Non-Confidential Attachment A – Malaysia Rebar A2/2019 Preliminary Determination Report

¹² Non-Confidential Attachment A at p8

¹³ Non-Confidential Attachment A at p13

33. To establish the like product, the IA examines based on the responses by the Petitioner and other interested parties. **Based on the submission received from producers/ exporters, the PUI exported to Malaysia is identical to the PUI sold in their countries.** [emphasis added]

The two co-operating Turkish exporters in the Malaysian investigation were Colakoglu and Diler Demir Celik (DDC).

In determining their normal values, the IA provided the following:

55. *Dumping margins were established for cooperating producers/exporters, by comparing the weighted average normal value of the subject merchandise sold in the domestic market of the alleged exporting country with the corresponding weighted average export prices to the Malaysian market. The comparisons were made at the same level of trade, at ex-factory level in respect of sales reported by the cooperating producers/exporters.*

79. *In examining the information provided by Colakoglu, the IA selected sales to all customers based on the **same product codes sold to Malaysia during POI** i.e., ***MT valued at TRY***. The IA notes that the volume of sales below cost of the like product represented ***% of the volume sold in the domestic market throughout the POI. Therefore, **the IA used all sales transactions in calculating the normal value.***

89. *In examining the information provided by DDC, the IA selected sales to all customers based on the **same product codes sold to Malaysia during POI** i.e., ***MT valued at TRY***. The IA notes that the volume of sales below cost of the like product represented ***% of the volume sold in the domestic market throughout the POI. Therefore, **the IA used all sales transactions in calculating the normal value.*** [emphasis added]

This suggests that the Malaysian investigating authority was indeed able to find sufficient Turkish domestic sales of grade 500 equivalent (the minimum yield strength product that was exported to Malaysia) for both Colakoglu and Diler (DDC) to determine a normal value for each of the cooperating exporters.

In assessing relative export volumes of (grade 500) reinforcing bar from Turkey to Australia and Malaysia over the same investigation period¹⁴, it is clear that in order for the Malaysian authority to meet the sufficiency requirements for normal value determination based on domestic Turkish grade 500 equivalent rebar sales, far larger volumes of grade 500 equivalent rebar sales were required in the Turkish domestic market during the investigation period (than were observed in INV 495). InfraBuild Steel estimates approximately [REDACTED] t of rebar were exported from Turkey to Malaysia during the POI compared to approximately [REDACTED] t exported to Australia for the same period. This comparison suggests that significantly larger volumes of equivalent 500 grade rebar may have been sold in the Turkish domestic market (approximately [REDACTED] t based on 5% sufficiency rule). This analysis is presented to demonstrate the differences in the orders of magnitude potentially found in the two investigations. This 5% estimate ([REDACTED] t) is significantly greater than the domestic sales volumes of equivalent sub-category C grade rebar reported (estimated at approximately [REDACTED] t, based on the Commission's 1% finding) by the exporters in INV 495 for the same investigation period, noting that Colakoglu and Diler were cooperating exporters in both investigations.

¹⁴ CONFIDENTIAL ATTACHMENT B

The *Malaysian Countervailing and Anti-Dumping Duties Regulations 1994*¹⁵ confirms the 5% sufficiency requirements:

Regulation 26. Determining normal value by examining sales in anti-dumping duty investigation.

- (2) *Sales of the like product in the domestic market do not permit a proper comparison where*
- (a) *the quantity of merchandise sold for consumption in the domestic market of the exporting country during the period of investigation is **less than five per centum** of the sales of the subject merchandise to Malaysia, unless there is evidence to demonstrate that such ratio is nonetheless of sufficient magnitude to provide for a proper comparison;*
 - (b) *the sales in the domestic market are not in the ordinary course of trade; or*
 - (c) *a particular market situation exists.*

2.2 United States of America

The response provided in January 2017 by the Turkish exporter, Habas, in completing their questionnaire for the United States' Department of Commerce's *Investigation No. A-489-829* concerning Steel Concrete Reinforcing Bar from Turkey clearly includes "home market" sales of grade 500 rebar (sub-category C in INV 495) albeit produced to the British Standard BS4449¹⁶:

Habas sold rebar according to the following specifications and grades in the home market:

Specification	Grade
ASTM A615	GR60
BS4449	B500B
SI 4466-3	S400
TSE708	S420
TSE708	TS 3A
TSE708	B420C

Another co-operating Turkish rebar exporter in the US investigation, Kaptan Demir Celik (**Kaptan**), reported home market sales to the Turkish Standard (TS708) and a number of other Standards¹⁷:

Kaptan sold rebar according to the following specifications and grades in the home market:

TS708
 ASTMA615
 ASTMA706
 BS4449 (British)
 JS33/05-GR300
 GOSTR52544/
 LNECE450
 INTE06-09
 NFA35-080

¹⁵ https://www.miti.gov.my/miti/resources/fileupload/Countervailing_and_Anti-Dumping_Duties_Regulations_1994.pdf

¹⁶ NON-CONFIDENTIAL ATTACHMENT C at p11

¹⁷ NON-CONFIDENTIAL ATTACHMENT C at p12

ABNT NBR 7480/ 07-CA-50
IS4446-400W
CSAG3018-09
DIN488-BST500S

A comparison of this list with the rebar Standards and grades contained in Colakoglu's product brochure¹⁸ (extract marked up below) confirms that there are a number of Standards and grades contained in the domestic sales listing of Kaptan (and likely other Turkish producers) that have a minimum yield strength requirement of 500MPa and ought to be classified under sub-category "C", if present, in INV 495:

BS4449:2005 (British Standard defining grades B500A, B500B and B500C)
NFA 35-080-1:2013 and NFA 35-080:2015 (French Standards defining grade B500B)
ABNT NBR 7480 (Brazilian Standard defining grade CA50)
CAN/CSA G30.18-09 (Canadian Standard defining grades GR 500R and GR500W)

Qualities	Standard	Yield Strength (Re) N/mm ² (min.)
A 400 NR	E 449 : 2010	400
A 440- 280H	NCh 204 : 2006	280
A 500 NR	E 450 : 2010	500
A 500C	ACHM 7-93	500
A 630- 420H	NCh 204 : 2006	420 - (Max = 580)
B 420 B	TS 708 : 2016	420
B 420C	TS 708 : 2016	420
B 450 C	DM. 14/01/2008	450
B 500 B	BS 4449:2005	500 (Max=650)
B 500 B	DIN 488 : 2009	500
B 500 BWR	IS 6935-2 :2007	500
B 500 C	BS 4449:2005	500 (Max=650)
B 500B	BDS 9252:2007	500
B 500B	MS 146 :2006	500
B 500B	NEN 6008 : 2008	500
B 500B	NFA 35-080-1:2013	500
B 500B	NFA 35-080:2015	500
B 500B	TS 708 : 2016	500
B 500C	TS 708 : 2016	500
CA 50	ABNT NBR 7480	500
FEE 400	NFA 35-016:1986	400

Qualities	Standard	Yield Strength (Re) N/mm ² (min.)
FEE 500	NFA 35-016:1996	500
GR 40	INTE 06-09-01	275- (Max=398)
GR 60	INTE 06-09-01	412 - (Max=535)
GR 60	INTE 06-09-02	420 - (Max=540)
GR 60	NTC 2289-2012	420 - (Max=540)
GR 300	JS 33 : 2013	300 - (Max=425)
GR 40	ASTM A 615	280
GR 400	JS 33 : 2013	400 - (Max=525)
GR 400R	CAN/CSA G30.18-09	400
GR 400W	CAN/CSA G30.18-09	400 - (Max=525)
GR 460 B	BS 4449:1997	460
GR 500R	CAN/CSA G30.18-09	500
GR 500W	CAN/CSA G30.18-09	500 - (Max= 625)
GR 60	ASTM A 615	420
GR 60	ASTM A 706	420 (Max= 540)
GR 75	ASTM A 615	520
OB 37	SR 438-1:2012	6mm≤d≤12mm=255 14mm≤d≤40mm=235
PC 52	SR 438-1:2012	8mm≤d≤14mm=355 16mm≤d≤28mm=345 32mm≤d≤40mm=335
S 400	IS 4466-3 : 2013	400 - (Max=520)
S 400 W	IS 4466-3 : 2013	400 - (Max=520)
S 500 W-C	IS 4466-3 : 2013	500 - (Max=650)
S 420	TS 708 : 2016	420 - (Max=546)

Kaptan's supplementary questionnaire response provides helpful clarification concerning viability of sales to Standards other than the Turkish Standard in the domestic market:

*There is a substantial overlap among the standards for rebar applicable in different countries, and if rebar produced to a foreign standard also satisfies the physical and mechanical requirements of a domestic standard, then such rebar may be appropriate for sale to a customer requiring that domestic standard or its equivalent.*¹⁹

¹⁸ <https://www.colakoglu.com.tr/assets/docs/online-product-catalogue.pdf> at pp108 and 110

¹⁹ NON-CONFIDENTIAL ATTACHMENT E at pp 12-13

If domestic sales of grades made to non-Turkish Standards have been inadvertently excluded from the domestic sales listing of Turkish exporters in INV 495 or grades having minimum yield strength of 500MPa (as specified by their relevant Standards, not Mill Test Certificates) have been incorrectly classified as sub-category B rather than sub-category C, then those transactions must be reintroduced into the Commission's consideration of the respective exporters' Turkish domestic sales.

SUMMARY

InfraBuild Steel respectfully requests that the Commission re-examine the domestic sales files provided by the Turkish exporters in Investigation 495 and seek clarification as required to ensure that all domestic sales of sub-category C goods, including goods produced to Turkish and other (International) Standards, where sold into the Turkish domestic rebar market, have been identified, correctly classified and included for normal value determination. We make this request on the basis that:

- there were a number of changes to the MCCs for exporters subject to in-country verification;
- there were no changes to the MCCs for exporters not subject to in-country verification;
- we are unable to reconcile the findings for sub-category "C" sales identified in sufficient volumes sold into the Turkish domestic market by the Malaysian investigating authority with the findings of the Commission in INV 495; and
- Turkish exporters subject to the United States' investigation declared sales of sub-category "C" made to Turkish and International Standards were sold into the Turkish domestic market.

It is InfraBuild Steel's contention that:

- all domestic sales in OCOT found to meet MCC sub-category "C", may be applied (possibly without adjustment) to the calculation of the normal value under s.269TAC(1);
- domestic sales found to meet MCC sub-category "C", be compared to domestic sales found to meet sub-category "B" for the purpose of calculating any price difference between the models; and
- all domestic sales in OCOT not found to meet MCC sub-category "C", be applied (with adjustment for price comparability under s.269TAC(8)) to the calculation of the normal value under s.269TAC(1).

The Commission is also requested to review Exhibit C-3.1.2 provided by Kroman Celik for information which may be relevant to grade specification adjustment.

Please do not hesitate to contact your InfraBuild Steel representative on record with any questions.

FOR AND ON BEHALF OF THE

AUSTRALIAN INDUSTRY APPLICANT

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