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Director
Operations 2
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

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Public File

Dear Sir/Madam

Investigation No. 524 – Continuation of anti-dumping measures – silicon metal exported from the People's Republic of China

Simcoa Australia Pty Ltd ("Simcoa") is the applicant company that has requested the continuation of anti-dumping and countervailing measures on silicon metal exported from the People's Republic of China ("China").

The Commission published ADN 2019/112 notifying the commencement of an inquiry into the continuation of the measures as requested by Simcoa (Investigation No. 524).

During the conduct of the Anti-Dumping Commission's ("the Commission") verification visit at Simcoa discussion arose concerning intermittent sales of the goods the subject of the measures to a related party of Simcoa (i.e. *company name*).

[Commercially sensitive information concerning sales information].

The sales would more appropriately be considered "spot" sales - if and when they do occur.

Simcoa has no commitment (to, or from) its affiliate for sales of silicon metal produced in Australia. Simcoa competes with Chinese exports to Australia of silicon metal which is the benchmark for competitive prices on the Australian market. If the measures are allowed to expire, Simcoa would lose current sales volumes on the Australian market and be required to compete with the dumped and injurious Chinese export prices (that the measures are intended to prevent). Simcoa would then need to secure export sales (at significantly lower returns) to replace domestic sales in Australia.

I trust this clarifies the confusion concerning any intermittent sales to Simcoa's affiliate.

If you have any questions concerning this submission, please do not hesitate to contact me on (08) 9780 6762, or Simcoa's representative Mr John O'Connor on (07) 3342 1921.

Yours sincerely

DAVID MILES
Vice President – Site Services and Marketing