

Staughtons Trade Advisory Group Pty Ltd
ABN 65 605 424 459
PO Box 867, Bacchus Marsh, Vic., 3340

PUBLIC RECORD VERSION

More The Director, Investigations 1,
Anti-Dumping Commission,
GPO Box 2013,
CANBERRA ACT 2601,
AUSTRALIA.

By Email: investigations1@adcommission.gov.au
3RD August 2020.

Case No 528-Review of Measures
Hot Rolled Coil Exports ex Taiwan

Dear Director,

We take this opportunity to present further submission on the methodology for a NIP being in response to the SEF on Case 528 and on behalf of the Importer C.A .

C.A. would like to ensure the Commission is aware of the situation re prevailing global HRC US\$ prices which are considerably less than those during the Review period , and which , based on the Platts reference prices of Confidential Attachment A ,are currently more than [REDACTED] % lower than the WAV CFR price for the Qtr Dec 2018, being the commencement of the Review period.

Whilst C.A is not in possession of the exporters actual AEP for the Review Period, the inference is that the exporter's NV is circa US\$ [REDACTED] /t FOB compared to US\$ [REDACTED] /t FOB being offered by the exporter for shipments in the 3rd Qtr 2020.

On this basis, should the expected Floor Price be circa US\$ [REDACTED] /t FOB , the obvious IDD will be US\$ [REDACTED] per tonne and we respectfully submit that the Duty assessment system is not a commercially viable option in that circumstance.

More importantly, on the basis that the anti-dumping system is intended to only remedy any 'causal' injury and not stop imports but especially when the only imports subject to measures all have negative dumping margins, the Commission is requested to seriously consider the adoption of an NIP based on the lower of either the lowest A\$ FOB price of other country non-dumped imports or the applicant's prevailing market price in the Review period less the evidenced importation costs from FOB to FIS including interest , SGA, profit, transport and clearance costs.

Attached are the following Confidential Attachments:

Attachment 'A'- detailing Platts CFR US\$ prices over the review period with the FOB Base grade price offers of CSC.

Attachment 'B' -copy of [REDACTED] current FOB price offers for Base Grade 'As rolled' HRC

Attachment 'C' – copy of Platts 'latest' HRC price references.

The Commission, as evidenced in Case No 521 on the applicant's initiated review of Zinc Coated steel coils, has access to the Platts subscription service (Refer to VR for 'Zongcheng'). That period of review was from July 2018 to June 2019 which accords with the review period for this HRC case.

Regards

M J Howard