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Director – Investigations 3
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

Precision pipe and tube steel from Vietnam

Dear Director,

This submission is made on behalf of Vina One Steel Manufacturing Corporation (Vina One) in response to the Anti-Dumping Commission's (the Commission) findings outlined in Statement of Essential Facts Report No. 550 (SEF 550).

It is noted that the Commission has established that Vina One's exports to Australia during the investigation period, were at a substantial negative margin. Vina One supports and confirms that the Commission's dumping findings outlined in SEF 550 provide an accurate summary of the verification team's findings following detailed examination of Vina One's financial records.

It is also noted that Vina One's public record version of its exporter verification report has been on the public record since February 2021, and in response, the applicant continues to argue that Vietnamese sourced HRC prices are '*... lower than available Asia-regional price benchmarks, and that this therefore translates into a lower than-competitive market price for subject goods selling prices in Vietnam*'. This is despite the Commission's confirmation that '*... Vina One's HRC purchase price against benchmark prices for Vietnam and found these closely aligned. As HRC was the largest cost segment, this gave the verification team a further level of confidence in the accuracy of the CTMS data.*'

The applicant continues to request that the Commission reveal the source of the benchmarks that formed part of its comparative analysis. Whilst this information is confidential, Vina One makes the following observations in the interests of transparency:

- HRC purchases sourced from Vietnam were not the lowest prices during the investigation period;
- HRC purchases sourced from other countries were the lowest prices during the investigation period.

PUBLIC VERSION

The verified data directly contradicts the claim made by the applicant and refutes any allegation that a market situation exists in Vietnam which would cause domestic selling prices and/or costs to be disregarded for establishing normal values.

On that basis, Vina One requests that the Commissioner terminate the investigation promptly, insofar as it relates to Vina One.

Yours sincerely

John Bracic