



J.BRACIC & ASSOCIATES
TRADE REMEDY ADVISORS

PO Box 3026
Manuka, ACT 2603
Mobile: +61 499 056 729
Email: john@jbracic.com.au
Web: www.jbracic.com.au

27 May 2021

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

Painted steel strapping from Vietnam

Dear Director,

This submission is made on behalf of Sam Hwan Vina Co Ltd (Sam Hwan) in response to the submission made by Signode Australia Pty Ltd (Signode), dated 13 May 2021.

In SEF553, the Commission concluded that a particular market situation does not exist in Vietnam as the raw material prices in Vietnam for HRC/CRC are consistent with market prices in Korea and Taiwan. Signode's sole response to the Commission's analysis is that '*...the latter prices are for CRC prices ex works that are not for slit CRC, and the Vietnamese prices are for slit CRC delivered into the Sam Hwan production facility. The prices, therefore, are not comparable.*'

This statement alone provides clear evidence that Signode's views and understanding are completely erroneous. As the Commission has verified through to source documents, Sam Hwan [REDACTED]

[REDACTED] **[production activities undertaken by Sam Hwan]**. Therefore, there is no question that the raw material price comparisons undertaken by the Commission are appropriate.

All other comments made by Signode in relation to Sam Hwan's dumping margin determination merely seek to cast doubt on the reliability and accuracy of the submitted and verified information, without any reasonable basis. Notwithstanding minor exceptions, Sam Hwan's costs and sales were confirmed by the Commission as being accurate, complete and relevant for the purposes of determining dumping.

Yours sincerely

John Bracic