



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

18 October 2021

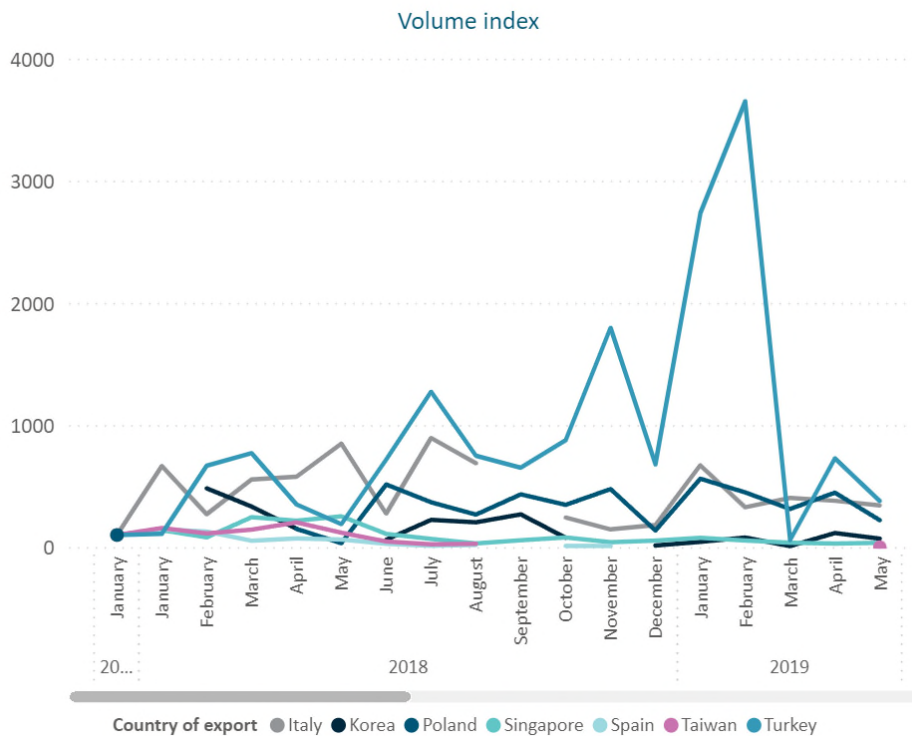
The Director - Investigations 2
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2600

Review of measures - Steel Reinforcing Bar exported from Korea

Dear Director

Please find attached a submission on behalf of Daehan Steel Co. Ltd (“Daehan”), in response to the Anti-Dumping Commission’s (“the Commission”) Statement of Essential Facts Report No. 566 (“SEF 566”).

Daehan urges the Commission to reconsider the imposition of the combination method of duty with regard to Daehan’s exports. It is import to understand and have regard to the circumstances of the global and Australian market. At present, exports of steel reinforcing bar to Australia are dominated by suppliers from Turkey, and to a lesser degree from Italy and Poland. This is confirmed by the Commission’s Trade Remedy Index data shown in the chart below.



PUBLIC VERSION

It is important to note that exports from these countries are not subject to dumping duties. Likewise, exports from Singapore and Taiwan are now no longer subject to measures.

Therefore, the particular risks which would support the preference for the combination duty method are not present and not relevant to Daehan's circumstance. That is, the vast majority of exports to Australia are from countries not subject to measures. There is virtually no risks associated with exports by Daehan, and certainly not in terms of undermining the effectiveness of the measures.

Daehan has cooperated in each and every inquiry conducted by the Commission, with issues only arising in Review 546 due to Covid-19. Daehan has no formal ties to importers in Australia and operates simply as a seller to unrelated buyers. Exports are sold at the agreed invoice price with no rebates or discounts which would raise concerns about the accuracy of the declared export price.

Daehan therefore requests the Commission to reconsider the appropriateness of the combination duty method, and recommend that duties revert to the originally imposed ad valorem method.

Yours sincerely

John Bracic