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7 June 2021

Mr Rhys Piper
Director
Investigations Unit 1
Anti-Dumping Commission
GPO Box 2013
CANBERRA ACT 2601

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Dear Mr Piper

For Public File

Re Statement of Essential Facts No. 569 – Grinding balls exported from The People's Republic of China

I. Executive Summary

Molycop rejects the Commissioner's proposed recommendation to the Minister for Industry, Science and Technology ("the Minister") in Statement of Essential Facts No. 569 ("SEF 569") to not take steps to secure the continuation of anti-dumping measures on grinding balls exported from The people's Republic of China ("China") on 9 September 2021.

Molycop concurs with the Commissioner's assessment that a particular market situation for grinding balls exists in China. Molycop, however, does not agree, that *"the Latin American export billet prices in FOB terms represents the best available information for ascertaining competitive market costs for steel billet*". The benchmark steel billet export price does not remove the influences of the Government of China ("GOC") on the full raw material steel input cost (i.e. the billet export price is materially below the fully-absorbed CTMS on a competitive basis). This can only be achieved through the replacement of a benchmark grinding bar price (based upon a domestic price sourced from a market economy country).

Once account is taken of the correct benchmark in the normal value assessment of the Chinese exporters, dumping margins greater than negligible levels will be assessed.

Molycop submits that the correct determination of normal values (based upon competitive market prices for grinding bar) is critical for the Minister to be satisfied about the future of anti-dumping measures on grinding balls exported from China. Normal values that reflect competitive market input costs free of GOC influence will establish that future exports of Chinese grinding balls to Australia will cause, or threaten, a recurrence of material injury that the anti-dumping measures are intended to prevent.

The correct recommendation to the Minister is, therefore, that he should take steps to ensure that the anti-dumping measures do not expire on 9 September 2021.

II. Background

On 21 September 2020, the Anti-Dumping Commission ("the Commission") published a notice inviting interested parties to apply for the continuation of anti-dumping measures on certain grinding balls (The goods") exported from China that are due to expire on 9 September 2021.

On 19 November 2020 Molycop made an application to the Commission requesting the continuation of the measures. Molycop is the sole Australian manufacturer of like goods to the imported goods. Molycop was a co-applicant (along with Donhad Pty Ltd) that made an application for the anti-dumping measures originally imposed on 9 September 2016 by the then Assistant Minister for Industry, Innovation and Science and Parliamentary Secretary to the Minister for Industry, Innovation and Science.

The measures were reviewed following Investigation No. 520 with the Minister declaring revised variable factors applicable to exports of grinding balls from China with effect from 20 November 2020. The revised measures that apply to the goods exported from China are as follows:

Table 1 – Current anti-dumping measures on grinding balls exported from China

Exporter	**Dumping Margin**	**Subsidy Margin**	**Effective Rate of Duty**	**Dumping duty method**
Changshu Longte Grinding Ball Co., Ltd	2.1%	N/A	2.1%	Combination of fixed and variable duty method
Jiangsu Yute Grinding International Co., Ltd	15.0%	N/A	15.0%	Combination of fixed and variable duty method
Anhui Sanfang New Material Technology Co., Ltd	0%	0%	0%	Floor price duty method
Iraeta Energy Equipment Co., Ltd	0%	1.1%	1.1%	Floor price duty method
Uncooperative and all other exporters	27.1%	6.9%	34.0%	Combination of fixed and variable duty method

The investigation period in review of measures inquiry No. 520 was 1 July 2018 to 30 June 2019. The Commissioner determined normal values for Chinese exporters under subsection 269TAC(2)(c) following confirmation that a particular market situation continued to apply on the Chinese domestic market for grinding balls.

In Report 520 the Commissioner included a "benchmark" steel price in the normal values for Chinese exporters. Molycop made representations in Investigation 520 that it disagreed with the basis for the selected benchmark (refer EPR Document (EPR 520 Document No. 025).

The normal values determined in Report 520 reflect the Commissioner's selected benchmark resulting in the Table 1 dumping margin assessments.

III. <u>Benchmark in SEF 569</u>

(a) Particular market situation

At Section 6.5 of SEF 569, the Commission stated that on the basis of the information before it "*it is the Commission's view that a particular market situation existed in respect of the domestic market for grinding balls in China for the inquiry period.*" This finding is not disputed by Molycop.

Having determined the existence of a particular market situation for grinding balls during the investigation period, the Commission then sought to "assess the scale" of the GOC's influence on the domestic prices for grinding balls in China.

To achieve this, the Commission "*had regard to a competitive benchmark for grinding bar, ferroalloys and steel scrap costs (where applicable)*". The Commission also stated that this approach was "*in* *line*" with the methodology used in review of measures Investigation No. 520. The Commission then "*compared each exporter's actual costs against these benchmarks to assess whether the exporter's prices are likely to have been distorted by the market situation*".

The selection of the steel input benchmark is therefore critical in establishing the extent of the GOC influence in the distortion of the domestic prices for grinding balls.

(b) Raw material steel input

Importantly, the Commission further noted that "*the cost of steel and relevant alloys (the chief raw material inputs) represent up to 90 per cent of the cost to make (CTM) for grinding balls*".

Molycop considers this is a relevant and material consideration in the steel input price – particularly when identifying the relevant steel input for benchmarking purposes (i.e. which raw material steel input to use including whether steel billet or grinding bar).

(c) Grinding bar as steel input

The Commission confirmed that three of the four cooperating exporters, namely:

- Changshu Longte Special Steel Co., Ltd ("Longte");
- Jiangsu Yute Grinding International Co., Ltd ("Jiangsu Yute"); and
- Jiangyin Xingcheng Maggoteaux Steel Balls Co., Ltd ("Xingcheng Maggotteaux"),

used "grinding bar" as the chief raw material input in the manufacture of the subject goods. Further, the Commission reiterated that the grinding bar "*represents the largest proportion of the cost of production*" of grinding balls.

The "*chief raw material input*" and the selection of a comparable benchmark is critical in the assessment of whether Chinese market costs "*reflect competitive market conditions*".

In its assessment of an appropriate benchmark for the replacement of the Chinese exporter's grinding bar purchase price, the Commission focused its attention on the following grinding bar selling price alternatives:

- private suppliers (as distinct from state invested enterprises);
- prices for imported grinding bar sold in China; or
- externally published grinding bar prices.

The Commission confirmed that private selling prices for grinding bar in China were unsuitable as these were the same as domestic selling prices by state invested enterprises. Imports of grinding bar into China were limited, hence this alternative was discounted. The Commission also discounted external domestic grinding bar prices as these were not available in a published format.

The Commission considered that as it could not access published date price for grinding bar that it remained of the view "*that an external benchmark can be* ***constructed based on the inputs which make up grinding bar*** *e.g. steel billet, ferroalloys and conversion costs. The benchmark can be used to identify a competitive market price.*" (emphasis added).

Respectfully, the Commission's conclusion is incorrect. Grinding bar used in the manufacture of grinding balls must be manufactured from Special Bar Quality steel (SBQ) rather than a Merchant Bar Quality (MBQ) steel, which the Commission's has chosen as its benchmark. It is simply not possible to manufacture an acceptable quality grinding ball from MBQ steel and it is both erroneous and naïve to propose the cost of manufacturing SBQ steel can simply be calculated by adding ferro alloys and a nominal conversion cost unrelated to SBQ steel and bar production.

Grinding balls must possess a combination of high hardness (abrasion resistance) and high toughness (chipping, spalling and breakage resistance) to perform satisfactorily in the extreme service conditions experienced in the comminution process. Accordingly, steel for the production of grinding bars must possess the following attributes which patently are impossible to achieve from MBQ steel or indeed from a MBQ Steel Mill (ie a mill producing only rebar, merchant bar or wire rod):

[*Commercial sensitive details concerning hardenability and toughness of steel required for SBQ quality billet*.]

Similarly, the rolling of SBQ quality billet or blooms into round alloy bar requires tighter tolerances, higher yield loss and more stringent QA controls than MBQ production, including but not limited to:

[*Commercial sensitive details concerning stringent QA controls of SBQ quality billet*.]

The selection of an MBQ billet as the benchmark is therefore erroneous as it does not possess inherent quality nor properties to be used a raw material input feed into grinding bar.

[*Commercial sensitive details concerning high energy cost associated with SBQ quality billet*.]

(d) Latin American billet price

The Latin American billet grade selected by the Commission is of standard grade A36/A36-08, that cannot be used as an intermediate steel product in the manufacture of grinding bar, as it is a plain carbon steel that does not possess the alloys for hardening purposes as required in grinding bar. The A36/A36-08 grade billet does not possess the required hardness and toughness attributes (see above) for it to be used in the manufacture of special grinding bar.

Additionally, the Brazilian mills likely to service the export port are manufacturers of MBQ billet which is not the SBQ billet grade required for grinding media.

The Commission is aware that Molycop provided a submission to the Commission (refer EPR document 005) detailing that the Latin America export billet price reflects excess production sold at marginal pricing. Molycop has reviewed the Commission's comments at 6.5.2 of SEF 569 concerning Molycop's proposed alternative data point as the basis for a benchmark. Molycop notes the Commission's comments that the "*multi-country Latin American benchmark is the preferred approach*". The Commission further states:

> "*This benchmark has previously been considered by the Anti-Dumping Review Panel (ADRP) and the Full Federal Court. Judicial and merits tribunal decision makers have not cast any doubt on the use of the benchmark, provided that it is objective and broadly representative of competitive costs. The Commission considers that the* ***multi-country Latin American***

benchmark continues to be objective and broadly representative of competitive costs." (Emphasis added).

Molycop disagrees with this proposition and has consulted the S&P Global Platts Specification Guide which confirms that the Billet Export FOB Latin American Port price is for Grade A36/A36M ex Vitoria port, Brazil[1]. That is, the export billet price is for supply by a Brazilian exporter (located in Latin America). The Latin America export billet price is thus a Brazilian export billet price and not a "multi-country" Latin America reference price for producers in that continent.

In its selection of the Latin American billet price the Commission argues that it has:

> "…..*selected a benchmark for billet based on reported export prices from Latin America because the Commission considers it to be representative of a competitive cost of production that would be payable in China in the absence of the GOC influence*."

This assertion is also inaccurate as the export prices are from a single port in Brazil for export that must compete on the global market – that is, the price represents what the Brazilian exporter must compete against – primarily with China as it accounts for the major proportion of global steel exports. In addition, the reference to a "competitive cost of production" is also misleading as the Commission has not verified whether the "competitive cost" is reflective of full cost recovery. The Latin American (or Brazilian) export billet price is marginally priced to compete on the export market (ostensibly with exports from the world's largest steel producer, China).

Molycop agrees with the Commission's statement that a "*multi-country benchmark*" is a preferred benchmark to pricing from a single country. Similarly, the benchmark must also be a fair, competitive price, that is at full cost recovery.

(e) Steel production costs

Molycop has obtained detailed liquid steel and billet cost data covering the Latin American region from two independent highly regarded research organisations with proven industry understanding and knowledge of the metals and resource industries,

[*Confidential names of companies and analysis of cost modelling*]

In summary this independent data clearly demonstrates that the Commission's chosen benchmark does not represent to full cost to make a sell (CTMS) a MBQ billet let alone a SBQ billet nor does it include any consideration for a margin or cost for capital employed for either a MBQ steel mill or, more accurately a SBQ steel mill.

[Confidential details of Latin American steel plants examine din cost modelling]

From the SBQ billet cost both a grinding media feed bar and grinding ball full CTMS is calculated for later comparison with independent grinding bar purchase and illustration of a comprehensive list of cost and margin components that should be considered in any constructed cost analysis of the billet, grinding bar and grinding media value chain. [*Cost modelling supportive of grinding bar pricing*].

[Confidential Table 2 of Latin American steel plants costs for SBQ Billet to grinding bar to grinding media]

[1] Confidential Attachment 1 – S&P Global Platts extract, Specifications Guide, Steel, ferrous scrap, ferroalloys and noble alloys; May 2020.

[*Confidential summary of cost summaries versus pricing for third party grinding bar*].

The Commission has stated that it has selected the benchmark Latin America export billet FOB price because it "*considers it to be representative of a competitive cost of production that would be payable in China in the absence of the GOC influence*." The Commission further contends:

> "*While the Commission notes Molycop's preference for using a single country benchmark, the Commission still contends that a multi-country benchmark, due to its larger sample size, is less susceptible to influence of differing market circumstances in individual countries. A benchmark based upon a single country is more likely to indicate the costs payable in that country, whereas the purpose of the benchmark is to ascertain a cost which would be payable in China."*

Molycop concurs with the Commission's comments concerning a benchmark should be representative of "multi-country" transactions where this is possible. However, Molycop has demonstrated that the Platts Latin America export billet FOB price is a single country export price for Brazil and does not reflect a price determined based upon numerous countries in Latin America. The Platts Latin America export billet FOB price therefore cannot be considered a "multi-country" benchmark.

Molycop also agrees that the purpose of a benchmark is to ascertain a cost at which would be payable in China. However, the standard Latin American export billet FOB price adjusted for the cost of the alloys cannot alone be considered to represent a suitable grinding bar benchmark price in China. The steel billet product is an ***intermediate*** steel product in the manufacture of grinding bar and does not fully account for the distortionary effects of the GOC's influence on grinding bar purchase prices in China. This is a significant oversight in the acceptance of a steel billet price as the benchmark. Further, the standard billet benchmark is not of a SAG Ball Quality billet equivalence and is of inferior steel quality as reflected in its lower price.

The benchmark Latin American export billet FOB price therefore falls significantly short of its intended purpose.

It is evident that the benchmark Platts Latin American export billet FOB price understates the SAG Ball Quality billet input cost required for grinding bar production. As a result, the benchmark used by the Commission to determine whether the grinding bar input cost of the cooperative Chinese exporters reflects "competitive costs" is substantially understated (by approximately US$xxx per metric tonne).

[*Commercially sensitive analysis billet benchmark versus SBQ quality grinding bar*].

[*Commercially sensitive Table listing MBQ Billet costs for select manufacturers*] *(f) Grinding bar prices*

The Commission has indicated that in considering an appropriate basis for a suitable benchmark that would enable it to contrast whether the cooperative Chinese exporters' input steel costs reflect "competitive costs" it examines each of the following alternatives:

- purchase prices by private companies for grinding bar in China;
- selling prices for imported grinding bar in China;
- grinding bar prices external to China.

The Commission ruled out private company selling prices for grinding bar in China and selling prices for imported grinding bar in China as not representative. The Commission was unable to obtain grinding bar selling prices from any "published" source and therefore reverted to an intermediate (published steel billet prices (i.e. an inferior steel input price not reflective of grinding bar quality). The Commission has indicated (in Section 6.5.2 of SEF 569) a preference for a multi-country benchmark for this purpose.

Molycop's 8 February 2021 submission (EPR Document 005) referred to the Commission's past practice in selecting an appropriate benchmark involving raw material domestic prices verified in other countries (refer Investigations 177, 190, 193, 203, 379, 441 and 516). It is noted that the domestic selling prices were verified by the Commission.

Molycop referenced that it had obtained domestic grinding bar prices from one of its affiliated companies [*country*] that purchase grinding bar from unrelated third party suppliers. This information was not validated by the Commission as it was considered that pricing from a single source could not be considered representative. Molycop was not notified of the Commission's position until the Commission's position was detailed in SEF 569.

[*Commercially sensitive details on grinding bar purchase prices in countries in North and South America, and Europe*]

(g) Benchmark for Cast Grinding Ball Producer

The Commission identified that Anhui Sanfang New Material Technology Co., Ltd ("Anhui Sanfang") uses scrap steel rather than billet in the production of grinding bar for grinding balls. The Commission considered that the Turnings Brazil South East Domestic Production Mill Delivered benchmark (published by Platts) was a suitable benchmark for contrasting Anhui Sanfang's scrap purchase price.

Consistent with its concerns with the steel billet benchmark, the scrap steel price is not a reasonable benchmark:

- as it is not of a sufficient quality (it has lower specification);
- it does not reflect competitive costs for steel scrap; and
- it does not address the full GOC impact of distortions for a grinding bar price – including for an integrated producer - as the GOC's plans and policies similarly impact the costs associated with electric arc furnaces and subsequent output as reflected in SEF 569 Appendix A – Particular Market Situation.

[*Commercially sensitive details on selected benchmark for turnings and validity of pricing*].

(h) Conclusion – benchmark for grinding bar

Molycop has established that the benchmark Latin America export billet FOB price is a single country export price. Further, this single-country export FOB price reflects a price sold into the global market to compete against exports from China – the world's largest producer of steel products.

Molycop has also demonstrated that the Latin America export billet FOB price is a price for "standard" grade Billet. That is, standard billet (grade A36/A36-08) does not possess the hardness and toughness required as use as a steel input as required for SBQ steel that is ultimately required to manufacture satisfactory quality grinding media. The absence of value-added alloys, gassing and casting costs from standard billet confirms that the lower cost steel billet is not a reliable benchmark for inclusion in a constructed selling price for grinding bar.

The inclusion of a standard grade steel billet in a constructed grinding bar selling price does not negate the full impact of the GOC's distortions on the steel input price for grinding balls. This can only be achieved by replacing the grinding bar purchase price for the three cooperative Chinese exporters that purchase grinding bar inputs. The grinding bar benchmark prices will have the desired impact of removing the distortionary impacts of the GOC's influence on the raw material steel input used to manufacture the subject goods.

In respect of the fourth cooperative exporter – Anhui Sanfang – Molycop does not consider that the selected benchmark scrap price is the required grade and quality of scrap suitable for use in grinding media applications and does not removes the full impact of the GOC's influence on raw material steel input prices for grinding balls. [Commercially sensitive p*roposed benchmark for scrap metal*] is a more reliable benchmark price for scrap metal that reflects the fully absorbed CTMS.

IV. Revised normal values and dumping margins

The multi-country grinding bar benchmark prices permits the Commission to properly assess constructed normal values for the cooperative Chinese exporters of grinding balls in accordance with subsection 269TAC(2)(c) of the *Customs Act*.

The inclusion of a more relevant and accurate benchmark will influence the Commission's preliminary finding concerning competitive costs for grinding bar for each of the cooperative exporters. The grinding bar benchmark will require the Commission to conclude that the cost of grinding bar for each of the exporters was not at a competitive market cost and as such the exporter's grinding bar costs are artificially low due to GOC during the investigation period.

The Commission therefore cannot determine normal values for the four cooperative exporters in accordance with subsection 269TAC(1) using the exporter's domestic sales prices as the steel input price does not reflect competitive market costs for grinding bar. Normal values for all Chinese exporters of the goods must therefore be assessed under subsection 269TAC(2)(c) – i.e. the same methodology as used in previous Investigations involving grinding balls in China (No's 316 and 520).

The constructed normal values are determined using the cost of production for each of the goods as detailed in the relevant model control code ("MCC") structure based upon the production method and diameter of the goods. Section 43(2) of the *Customs (International Obligations) Regulation 2015* (the Regulation) requires that if the exporter maintains records of the goods in accordance with generally accepted accounting principles (GAAP) and those records reasonably reflect competitive market costs associated with the production or manufacture of the goods, then the cost of production must be determined using the exporter's records.

The inclusion of the benchmark based upon the grinding bar prices from multi-country third party invoiced transactions when contrasted with each of the Chinese exporter's steel input cost for grinding bar will demonstrate that competitive costs for the steel input (at the grinding bar input production stage) do not reflect competitive market costs. The constructed normal value therefore (for each exporter) will include the benchmark steel input price, plus freight costs for delivery to factory. The Commission will construct normal values having regard to:

- the cost of production of the exported goods under section 43(2) of the Regulation;
- *the weighted average selling, general and administrative ("SG&A") cost as reflected in each* of the exporter's records under section 44(2) of the Regulation; and
- the profit achieved on domestic sales of the exporter made in the ordinary course of trade during the investigation period in accordance with section 45(2) of the Regulation.

The comparison of the respective Chinese exporter's constructed normal values with export prices is expected to confirm the existence of positive dumping margins above negligible levels for all cooperative (and uncooperative) exporters in China.

V. <u>Will future exports of the goods be at dumped prices?</u>

With normal values assessed on the basis of the constructed production cost methodology that includes a benchmark reflecting market-based prices for grinding bar, it is considered that in the absence of an increase in Chinese export prices to Australia, future Chinese exports of the goods will continue at dumped prices.

In its application for the continuation of the measures, Molycop identified that it was adversely affected by the increasing volumes of grinding media balls imported into Australia by [name of exporter].

[*Commercially sensitive details concerning Chinese supplied grinding balls on Australian market*]

Molycop anticipates that Chinese export prices will remain flat (and likely decline should the measures be allowed to expire) as Chinese exporters compete for sales in Australia against growing import volumes from India and Thailand.

VI. <u>Will material injury continue</u>?

In its application for the continuation of anti-dumping measures, Molycop submitted that should the measures be allowed to expire the Australian industry would experience a recurrence of material injury from the dumping of grinding balls exported from China.

[*Commercially sensitive details concerning Chinese supplied grinding balls on Australian market*]

Molycop's view on the recurrence of material injury from dumped exports of Chinese grinding balls to Australia has not altered.

Molycop disagrees with the Commission's assessment in SEF 569 that "*there is insufficient evidence before it to be satisfied that any future exports are likely to be dumped should the measures be allowed to expire*"[2]. Based upon the information included with this submission, the Commission has available to it relevant and accurate information to assist it with the construction of competitive normal values for the Chinese exporters of grinding balls. The relevant information will permit the Commission to calculate positive dumping margins concerning the exported goods.

The Commission's price undercutting analysis in SEF 569 was examined on the basis of sales via two channels to market:

(i) to end-users via importers; and
(j) direct to end-users.

[2] SEF 569, P. 67.

In the sales via end-users analysis, the Commission found that "*the Australian industry's prices were undercut in only one quarter of the inquiry period, and in relation to only one diameter of ball*" and further "*In all other diameters, the Commission found that the Australian industry was less expensive than the imported grinding balls.*"

In sales direct to end-users for forged grinding balls (i.e. from Chinese imports) the Commission found that "*the delivered price of exports from China did undercut the Australian industry's prices by between 10 and 29 per cent*."

Molycop draws the Commission's attention to the magnitude of the *preliminary* dumping margins determined for imported sales direct to end-users. The dumping margins of this magnitude are only achievable on the basis that the constructed normal values relied upon by the Commission are premised on a benchmark that does not reflect the market selling price for grinding bar (i.e. the benchmark is **under-stated**).

[*Commercially sensitive material injury indicators - Australian industry*].

The Commissioner's conclusion that should the measures be allowed to expire that a recurrence of material injury to the Australian industry is not "likely". This conclusion is premised on the Commissioner's preliminary finding that the Chinese exports to Australia were not at dumped prices. This submission provides the Commissioner with information to permit a reliable assessment of an accurate benchmark that confirms the existence of positive dumping margins for Chinese exports to Australia. This information will lead the Commissioner to re-examine the preliminary conclusions as to the likelihood of a recurrence of material injury from dumping.

Molycop contends that the preliminary findings in SEF 569 cannot be sustained. That is, the information now available to the Commissioner requires the Commissioner to re-assess the determination of normal values and re-visit his conclusions on the likelihood of a recurrence of material injury from exports of grinding balls to Australia from dumped prices.

VII. Conclusion and recommendation

Molycop welcomes the Commissioner's finding that a particular market situation for grinding balls in China was evident in the investigation period.

Molycop, however, rejects the Commissioner's normal value and consequent dumping margin finding for Chinese exporters of grinding balls to Australia.

Molycop has included detailed analysis with supporting information in this submission that the Commissioner's reliance on a benchmark Latin America billet export FOB price is erroneous as it does not reflect "competitive market costs" and is priced below the fully absorbed CTMS the billet. The more relevant and reliable benchmark is that derived from market selling prices across multi-country suppliers for grinding bar. The revision of normal values for Chinese exporters taking full account of the relevant and reliable benchmark will result in the assessment of dumping margins above negligible (i.e. 2 per cent) levels.

For the Chinese exporter that uses scrap as its steel input, Molycop similarly does not consider that the selected benchmark permits for the full cost recovery of the purchases scrap steel (when contrasted with Turkey and Chinese equivalents). Additionally, Molycop seriously questions the veracity of the use of this specific scrap benchmark in the actual production of grinding media given the significant operational and cost implications associated with it use. Molycop proposes that the benchmark that reflects full cost recovery and is reflective of competitive market costs is the US East Coast export scrap price FOB East Coast is a more reliable benchmark price for scrap metal.

The dumping of Chinese grinding balls on the Australian market presents ongoing material injury to the Australian industry [*commercially sensitive market information*].

Should the Commissioner recommend to the Minister that the measures be allowed to expire, there exists a foreseeable and imminent likelihood of a recurrence of material injury that the measures are intended to prevent, [*commercially sensitive market information*].

Molycop therefore requests that the Commissioner recommend to the Minister that he take steps to ensure that the measures on certain grinding balls exported from China not be allowed to expire on 9 September 2021.

If you have any questions concerning this submission, please do not hesitate to contact me on (02) 4974 0414 or Molycop's representative Mr John O'Connor on (07) 3342 1921.

Yours sincerely

Keith Ritchie
General Manager Operations
Molycop Australia