

26 October 2021

18 Resolution Drive
PO Box 1246
Unanderra NSW 2526 Australia
ABN 22 098 674 545

P: 1300 BISALLOY
F: 61 2 4272 0456

www.bisalloy.com.au

Ms Thuy Lee
Case Manager
Investigations 1
Anti-Dumping Commission
Level 6, 215 Spring Street
Melbourne Victoria 3000

Email: Thuy.Lee@adcommission.gov.au

Dear Ms Lee

Public File

Investigation No. 578 – Q&T steel plate exported from USA – SSAB Alabama submission of 6 October 2021

We refer to the submission on behalf of SSAB Alabama dated 6 October 2021 (EPR Document No. 012).

Bisalloy Steels Pty Ltd (“Bisalloy”) notes that this most recent submission on behalf of SSAB Alabama again fails to comment on the export of its Quenched and Tempered (“Q&T”) steel plate to Australia from the USA at dumped and injurious prices. Rather, the SSAB Alabama submission seeks to attribute injury to factors other than its dumping and the impact on the Australian industry.

Bisalloy reiterates its comments in its 23 August 2021 submission. Further, Bisalloy has participated in a verification process with the Anti-Dumping Commission (“the Commission”) and addressed the relevant factors pertinent to the current investigation.

Bisalloy disagrees with the statements made on behalf of SSAB Alabama that the injury sustained by the Australian industry is volume-related only. SSAB Alabama’s viewpoint ignores the impact of the dumped export prices on the broader Australian market participants. Bisalloy notes the statement by SSAB Alabama that “**SSAB AU does not differentiate in its pricing as between Q&T steel plate exported to Australia from SSAB facilities, wherever they may be located**” as confirmation that the injurious pricing activity associated with SSAB exports from Finland and Sweden to Australia have continued with the dumped export prices from the USA.

Bisalloy has commented in its 23 August 2021 submission addressing SSAB Alabama’s conclusions about Bisalloy Steel’s broader financial results.

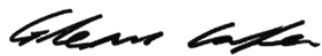
SSAB Alabama’s submission on injury seeks to absolve itself as a cause of any injury from its dumped exports from the USA that have replaced the previously determine dumped and injurious exports from Finland and Sweden. It cannot be refuted that the dumping by SSAB Alabama has replaced exports from Finland and Sweden (with an overall increase in volumes from the USA when contrasted with the volumes from Finland and Sweden). It also cannot be ignored that the injurious export prices by the Australian industry’s largest competitor do have a significant impact on the broader industry selling prices.

Bisalloy Steel rejects SSAB Alabama's attempts to deflect injury from its dumped and injurious exports of Q&T steel plate to "other" factors. It cannot be disputed that the dumped exports to Australia from the USA are the major cause of price and volume competition in a market that has remained buoyant throughout the pandemic. The claim by SSAB Alabama that its selling prices are above the USP is meaningless and lacks relativity – as the current USP determined in Investigation 506 was based upon the 2018 year when steel prices were significantly below the levels of 2021.

Bisalloy Steel's requests the Commission to dismiss SSAB Alabama's representations that seek to attribute injury to the Australian industry to factors other than SSAB Alabama's exports to Australia during the 2020 investigation period.

If you have any questions concerning this submission, please do not hesitate to contact me on (02) 4272 0403.

Yours sincerely



Glenn Cooper
CEO and Managing Director