



**J.BRACIC & ASSOCIATES**  
TRADE REMEDY ADVISORS

PO Box 3026  
Manuka, ACT 2603  
Mobile: +61 499 056 729  
Email: [john@jbracic.com.au](mailto:john@jbracic.com.au)  
Web: [www.jbracic.com.au](http://www.jbracic.com.au)

16 June 2022

Director, Investigations Unit 4  
Anti-Dumping Commission  
GPO Box 2013  
CANBERRA ACT 2601  
AUSTRALIA

### **Dumping Investigation into Merchant Bar exported from Taiwan**

Dear Director,

Please accept this submission made on behalf of Feng Hsin Steel Co., Ltd (Feng Hsin), which responds to the Commission's findings contained in Statement of Essential Facts Report No. 584 ("SEF 584"). Feng Hsin supports and welcomes the Commission's findings and recommendations, and concurs with the comprehensive injury analysis outlined in the report.

#### **Established facts in SEF 584**

In reviewing the Commission's detailed analysis of the industry's economic condition, it is evident that Infrabuild has experienced improved economic and financial performance measures during the investigation period, when compared against prior years of the injury period. The evidence also confirms that modest declines in certain economic indicators over the final five months of the investigation period, were within normal tolerances, and therefore, consistent with the normal ebb and flow of the steel business and market cycles.

It is also worth noting that the Commission found that broader market disruptions caused by other factors, likely contributed to increased raw material costs, which in turn impacted Infrabuild's profits and market share from November 2020 onwards. The publicly available evidence<sup>1</sup> relevant to Infrabuild's overall economic performance of its structural steel business confirms that the slight weakness in the second half of the investigation period was short-lived, and again within the normal

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<sup>1</sup> [H1-FY22-Investor-Presentation.pdf](#), page 9.

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ebb and flow of the Australian steel market.

Feng Hsin therefore urges the Commission to terminate the investigation as soon as practicable, pursuant to subsection 269TDA(13) of the *Customs Act 1901*.

John Bracic