



Australian Government
Anti-Dumping Commission

Anti-Dumping Commission
Level 35, 55 Collins Street
Melbourne VIC 3000

Mr Paul O'Connor
Panel Member, Anti-Dumping Review Panel
c/o- ADRP Secretariat

By e-mail: ADRP@industry.gov.au

Dear Mr O'Connor

Steel reinforcing bar exported from China – ADRP Review 84

I write with regard to the notice under section 269ZZI of the *Customs Act 1901* (the Act) published on 6 June 2018, advising of your intention to review the decision of the Assistant Minister for Science, Jobs and Innovation to publish a notice under subsection 269ZDB(1)(a)(iii) of the Act (the reviewable decision). The reviewable decision was published on the website of the Anti-Dumping Commission (the Commission) on 20 April 2018, referred to in *Anti-Dumping Notice No. 2018/49*.

I understand that certain information has already been supplied to you through a number of conferences with Commission officers. Further to those conferences, this submission provides further information relating to the Commission's decision in reviews 411, 412 and 423 to not include, in its benchmark calculation, the steel billet cost of an integrated Vietnamese producer verified as part of Investigation 416.

The Commission did not include the Vietnamese producer, Hoa Phat Group, in its benchmark calculation intended for raw material replacement, as the producer's steel billet cost information was only available on an annual basis and not on a quarterly basis. Hoa Phat Group provided cost data on a quarterly basis for the production of various models of steel reinforcing bar, which included the cost of the individual raw materials for the production of steel (iron ore, coking coal, scrap etc). It could not provide the cost of production for steel billet on a quarterly basis.

The Commission believes that it would be inappropriate to include this annual billet cost in its quarterly based steel billet benchmark, as considerable movement in steel prices between quarters would not be accurately reflected as part of this methodology.

The Commission remains at your disposal to assist you in this matter, and is available to participate in a further conference if you consider it appropriate to do so.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Dale Seymour'.

Dale Seymour
Commissioner
Anti-Dumping Commission

6 July 2018