



Australian Government
Department of Industry,
Science and Resources

Anti-Dumping Commission

CUSTOMS ACT 1901 - PART XVB

ANTI-DUMPING COMMISSION REINVESTIGATION REPORT FOR THE ANTI-DUMPING REVIEW PANEL

REINVESTIGATION OF CERTAIN FINDINGS IN REPORT NO. 638

**RELATING TO THE CONTINUATION OF ANTI-DUMPING MEASURES ON
CERTAIN QUENCHED AND TEMPERED STEEL PLATE**

**EXPORTED TO AUSTRALIA FROM THE REPUBLIC OF FINLAND,
JAPAN AND THE KINGDOM OF SWEDEN**

18 July 2025

CONTENTS

CONTENTS.....	2
ABBREVIATIONS.....	3
1 SUMMARY AND FINDINGS	4
1.1 INTRODUCTION AND FINDINGS	4
1.2 BACKGROUND TO REINVESTIGATION	4
1.3 CONDUCT OF REINVESTIGATION	6
2 REINVESTIGATION OF UNDERCUTTING ANALYSIS AND INJURY FINDING	9
2.1 FINDING	9
2.2 ADRP REQUEST FOR REINVESTIGATION	9
2.3 SECTION A: PROPER TIMING OF PRICE COMPARISON TEST	10
2.4 SECTION B: EXCLUSION OF PRE-INQUIRY SALES	13
3 APPENDICES AND ATTACHMENTS	16

ABBREVIATIONS

\$	Australian dollars
The ADC	Anti-Dumping Commission
ADN	Anti-Dumping Notice
The Act	<i>Customs Act 1901</i>
The ADRP	the Anti-Dumping Review Panel
The applicant	SSAB EMEA AB and SSAB Swedish Steel Pty Ltd
Bisalloy	Bisalloy Steels Pty Ltd
CFR	Cost and freight
COGS	Cost of goods sold
the commission	the Anti-Dumping Commission
the Commissioner	the Commissioner of the Anti-Dumping Commission
Finland	the Republic of Finland
the goods	Quenched and tempered steel plate (also referred to as 'the goods' or Q&T steel plate)
MCC	Model control code
the then Minister	the then Minister for Industry and Science
PRR	Preliminary Reinvestigation report
Sweden	the Kingdom of Sweden
SSAB AU	SSAB Swedish Steel Pty Ltd
the SSAB companies	SSAB AU and SSAB EMEA collectively
SSAB EMEA	SSAB EMEA AB
REP 638	<i>Anti-Dumping Commission Report No. 638</i>
the measures	the anti-dumping measures
The notice	ADN 2024/064: the dumping duty notice (accepting the findings of Report 638)
RFI	Request for Information
the Manual	The Dumping and Subsidy Manual

1 SUMMARY AND FINDINGS

1.1 Introduction and findings

The Commissioner of the Anti-Dumping Commission (the Commissioner), upon reinvestigation, is of the view that the findings in *Anti-Dumping Commission Report No. 638* (REP 638), that the expiration of the anti-dumping measures (the measures) would lead, or would be likely to lead, to a continuation of, or a recurrence of, the dumping and material injury that the measures are intended to prevent should be affirmed.

The Commissioner has found, upon reinvestigation, that the Minister's decision in Continuation Inquiry 638 should be affirmed, on the basis that:

- The material terms for 97% (by volume) of SSAB Swedish Steel Pty Ltd (SSAB AU)'s invoiced sales were established in the purchase orders and therefore the proper timing for price comparison, in these circumstances, is the purchase order date. Consistent with the finding in REP 638, using the purchase order date as the appropriate point of price comparison, SSAB AU was found to have undercut the prices of Australian industry in respect of wear grade goods sold to common customers.
- For sales that were invoiced during the inquiry period, where the purchase order date preceded the inquiry period, those sales should not be excluded from the commission's price undercutting analysis because these purchase orders are relevant evidence when considering the likelihood of the continuation or recurrence of material injury.

The above findings, considered along with other relevant findings outlined in REP 638, support the finding that the expiration of the measures would lead or be likely to lead to a continuation of, or recurrence of, the dumping and material injury that the measures are intended to prevent.

1.2 Background to reinvestigation

1.2.1 Reviewable decision

On 4 December 2023, the Commissioner initiated an inquiry into whether to continue the measures applying to quenched and tempered steel plate (the goods) exported to Australia from the Republic of Finland (Finland), Japan and the Kingdom of Sweden (Sweden). The measures are in the form of a dumping duty notice (the notice).

The Commissioner initiated the inquiry following an application lodged by Bisalloy Steels Pty Ltd (Bisalloy) seeking a continuation of the measures.¹

¹ EPR 638, item 1

SSAB EMEA and SSAB AU cooperated with the inquiry. Following the inquiry, the Commissioner recommended that the measures be continued, and that the effective rate of dumping be varied. The revised effective rates of duty are detailed in Table 1, below.

Country	Exporter	Effective rate of duty (%)
Finland	All exporters	8.6
Japan	All exporters	5.2
Sweden	SSAB EMEA AB	8.6
	All other exporters	8.6

Table 1: Effective rates of duty from REP 638

On 3 October 2024, the then Minister for Industry and Science (the then Minister) accepted the recommendations of REP 638 and declared his decision to secure the continuation of the measures.²

1.2.2 Review of the Minister's decision

On 15 January 2025, the Anti-Dumping Review Panel (ADRP) published an application lodged jointly by SSAB EMEA and SSAB AU,³ collectively referred to as the SSAB companies, for a review of the Minister's decision (the reviewable decision). The SSAB companies sought a review of the reviewable decisions on 2 grounds:

1. First ground – unsound price comparison basis for recommendation that the measures be continued; and
2. Second ground – “likelihood” finding infected by misappreciation of market dynamics.

On 15 January 2025, the ADRP published a notice of its intention to conduct a review of the reviewable decision.⁴

1.2.3 Request for reinvestigation

On 18 March 2025, the ADRP requested, under section 269ZZL of the *Customs Act 1901* (the Act), that the Commissioner reinvestigate the following finding in REP 638:

‘The finding that the Commissioner was satisfied that the expiry of the measures applying to the goods exported to Australia from Sweden would lead, or be likely to lead, to a continuation of, or a recurrence of, material injury that the measures are intended to prevent. In particular, the finding that the pricing analysis shows that in relation to wear grade plate (being the most common grade sold in the Australian

² [ADN No. 2024/064](#) refers.

³ Application, SSAB EMEA AB & SSAB Swedish Steel Pty Ltd, 15 January 2025, on ADRP's website: [ADRP 2024/171](#)

⁴ Public Notice – Intention to Conduct a Review, 15 January 2025, on ADRP's website: [ADRP 2024/171](#)

market) SSAB AU's imports of dumped goods from Sweden undercut the Australian industry's prices.'

Specifically, the ADRP requested the Commissioner to reinvestigate the first ground of the SSAB companies' review application. In its letter of request, the ADRP identified 2 specific issues for reinvestigation:

Section A: Proper Timing of Price Comparison Test

The ADC is therefore requested to reinvestigate its findings relating to the price undercutting analysis in respect of wear grade products in order to ensure comparability, in respect of timing, in compliance with its obligations under of s 269TAE(2AA). In this regard, the ADC should reinvestigate whether the appropriate price comparisons should be based on the purchase orders of both SSAB AU and Bisalloy, rather than invoice date.⁵

Section B: Exclusion of Pre-Inquiry Sales

If the ADC's reinvestigation of the price undercutting analysis under Section A above, results in the price comparison being based on the purchase order date (rather than invoice date), then the ADC is requested to reinvestigate and further consider the Applicants' contention that the "pre-enquiry period sales" should have been excluded from the price undercutting analysis. In this regard, the ADC should in its reinvestigation take into consideration its obligations under s 269T(2AD) and s 269T(2AE) of the Act.⁶

1.3 Conduct of reinvestigation

1.3.1 Approach to the reinvestigation

The Commissioner has conducted this reinvestigation in accordance with both section 269ZZL(2) of the Act and the ADRP's letter of request. The commission has assisted the Commissioner in undertaking the reinvestigation, pursuant to the commission's functions as outlined in section 269SMD.

In conducting the reinvestigation, the Commissioner has considered:

- the grounds accepted for review (as published by the ADRP under section 269ZZI)
- the ADRP's letter of request to the Commissioner
- information contained in the SSAB companies' application to the ADRP
- information contained in submissions made to the ADRP in relation to the SSAB companies' application
- the submission received from Bisalloy in response to the file note (see 1.3.2)
- responses to the Request for Information (RFI) and other information received following stakeholder consultation (see 1.3.3).

⁵ Letter of request at paragraph 18. on ADRP's website: [ADRP 2024/171](#)

⁶ Letter of request at paragraph 28. on ADRP's website: [ADRP 2024/171](#)

1.3.2 Submissions received prior to PRR 638

The commission's file note of 10 April 2025 invited interested parties to lodge submissions on the matters of this reinvestigation.⁷ The commission received a submission from Bisalloy.⁸ The commission has had regard to this submission in reaching the findings of this report.

1.3.3 Stakeholder consultation

The commission sought additional information from Bisalloy and SSAB AU in the form of an RFI and both parties responded to this request.⁹ These responses are contained at **Confidential Attachment 2** and **Confidential Attachment 3**. This information was used to:

- inform the commission's understanding of each company's sales and delivery processes
- establish whether the material terms of SSAB AU's sales were set at the purchase order date
- enable the commission to conduct the price undercutting analysis using the purchase order date as the date of sale, should the purchase order date be established as the appropriate point of price comparison.

The commission also held meetings with representatives from 2 companies that sourced the goods from Bisalloy and/or SSAB in the inquiry period, to discuss their procurement and delivery processes. The commission's records from these meetings are contained at **Confidential Attachment 4**.¹⁰

1.3.4 Preliminary reinvestigation report

On 5 June 2025, the commission published the Preliminary reinvestigation report (PRR) 638. This report outlined the Commissioner's preliminary reinvestigation findings and invited interested parties to lodge submissions in response to the report by 18 June 2025.¹¹

1.3.5 Submissions received in response to the PRR

The commission received a submission from Bisalloy.¹² Bisalloy's submission is largely supportive of the commission's findings in the PRR. However, Bisalloy submits that the material views for price comparison should be established at invoice date. Bisalloy's submission and the commission's response are detailed in section 2.3 of this report.

⁷ EPR 638, item 30

⁸ EPR 638, item 31

⁹ EPR 638, item 32

¹⁰ EPR 638, item 32

¹¹ EPR 638, item 33

¹² EPR 638, item 34

PUBLIC RECORD

The commission notes that the SSAB companies did not make a submission in response to the PRR.

2 REINVESTIGATION OF UNDERCUTTING ANALYSIS AND INJURY FINDING

2.1 Finding

The Commissioner has found, upon reinvestigation, that the Minister's decision in Continuation Inquiry 638 should be affirmed, on the basis that:

- The material terms for 97% (by volume) of SSAB AU's invoiced sales were established in the purchase orders and therefore the proper timing for price comparison, in these circumstances, and for these sales, is the purchase order date. Consistent with the finding in REP 638, using the purchase order date as the appropriate point of price comparison, SSAB AU was found to have undercut the prices of Australian industry in respect of wear grade goods sold to common customers.
- For sales that were invoiced during the inquiry period, where the purchase order date preceded the inquiry period, those sales should not be excluded from the commission's price undercutting analysis because these purchase orders are relevant evidence when considering the likelihood of the continuation or recurrence of material injury.

The above findings, considered with other relevant findings outlined in REP 638, support the finding that the expiration of the measures would lead or be likely to lead to a continuation of, or recurrence of, the dumping and material injury that the measures are intended to prevent.

2.2 ADRP request for reinvestigation

In its letter of request, the ADRP identified 2 specific issues for reinvestigation:

Section A: Proper Timing of Price Comparison Test

The ADC is requested to reinvestigate its findings relating to the price undercutting analysis in respect of wear grade products in order to ensure comparability, in respect of timing, in compliance with its obligations under of section 269TAE(2AA). In this regard, the ADC should reinvestigate whether the appropriate price comparisons should be based on the purchase orders of both SSAB AU and Bisalloy, rather than invoice date.¹³

Section B: Exclusion of Pre-Inquiry Sales

If the ADC's reinvestigation of the price undercutting analysis under Section A above, results in the price comparison being based on the purchase order date (rather than invoice date), then the ADC is requested to reinvestigate and further consider the Applicants' contention that the "pre-enquiry period sales" should have

¹³ Letter of request at paragraph 18.

been excluded from the price undercutting analysis. In this regard the ADC should in its reinvestigation take into consideration its obligations under section 269T(2AD) and section 269T(2AE) of the Act.¹⁴

The commission's findings in relation to these 2 issues follows.

2.3 Section A: Proper Timing of Price Comparison Test

In its request for reinvestigation, the ADRP further notes that:

“the ADC has an obligation to ensure comparability between prices that are being compared in a price undercutting analysis, to meet the requirements of s 269TEA(2AA) of the Act (and Articles 3.1 and 11.3 of the Anti-Dumping Agreement). The Dumping and Subsidy Manual - December 2021 (‘the Manual’) particularly refers to “timing” with reference to ensuring that the transactions are made under the same conditions in a price undercutting analysis that compares the price of the imported goods with the sales price of the locally produced goods.”¹⁵

The Manual further elaborates on the notion of “same conditions” by detailing a non-exhaustive list of relevant factors, including timing, volume, discounts, delivery, credit, and same customer.¹⁶

In its response to the commission's RFI, SSAB AU stated that:

“The date of the purchase order was the date of sale of the product to the customer. All purchase order sales are committed at that time and prices are fixed and not altered after that time. At law, this is established by the fixed price commitments under purchase orders of the type concerned, which are binding contracts between SSAB and its customer at the price set out in the purchase order. The purchase orders require the price to be fixed and there can be no increase unless agreed to by the parties.”¹⁷

Effectively, SSAB AU submits that the material terms of the contract are set at the date of the purchase order and that is therefore the appropriate timing for a price comparison.

The commission requested additional information, and the purchase order data considered necessary to establish whether purchase order date would be the appropriate point of price comparison. The commission notes that this information is new in the reinvestigation, provided in response to the RFI and was not provided to the commission during the conduct of the inquiry. In particular, the commission requested that SSAB AU provide supporting documentation in relation to the largest purchase orders by volume to demonstrate that the purchase order resulted in the manufacture of the goods ordered,

¹⁴ Letter of request at paragraph 28.

¹⁵ Letter of request at paragraph 12.

¹⁶ The Manual at page 100.

¹⁷ Confidential Attachment 2.

and that those specific goods were delivered and invoiced in satisfaction of the terms implicit to the purchase order. SSAB AU provided the requested information.

As well as completing the RFI, Bisalloy also made a submission on 28 April 2025 in response to the commission's file note published on 10 April 2025.¹⁸ Bisalloy submitted that the material terms of sale are established at the invoice date, rather than the purchase order date. Bisalloy details a range of legal, accounting and commercial perspectives in support of its claim. Bisalloy further submits that:

*'delays in delivery dates, potential partial shipments (or partial shipments from inventory and mill orders) and the possibility of blanket customer purchase orders covering a multitude of shipments over a staged delivery and invoicing period, would mean that the final material terms of such sales are ultimately finalised at the time of invoice.'*¹⁹

The commission also held a teleconference with 2 significant purchasers of the goods in the Australian market to inform its understanding of their purchasing processes and expectations.

The commission has considered the claims made by SSAB AU and Bisalloy and the information provided by the purchasers.

For the data supplied by SSAB AU, the commission traced the information on the purchase order relating to price, quantity and delivery through the sales chain (from purchase order through manufacture, shipment, arrival and delivery to the customer). The commission observed that purchase orders relating to 97% of the volume of sales had purchase order pricing identical to, or within \$10 per tonne (less than half of one per cent of the purchase order price), of the sales invoice price. The commission considered that these purchase orders were materially consistent with the corresponding sales invoices. The commission noted that the quantity listed on the purchase order was generally not invoiced on one sales invoice, but rather across multiple invoices and that the delivery of these quantities was spread across multiple delivery dates, some of which were significantly beyond the delivery date listed on the purchase order.

Given the commission's observations about the extended delivery times, the commission sought specific information from SSAB AU regarding the 2 largest purchase orders by volume to satisfy itself that the goods delivered and invoiced corresponded to the purchase order. SSAB AU supplied information to demonstrate to the commission that the goods invoiced and delivered had been specifically manufactured in response to the purchase order.

One of the customers that the commission met with confirmed that the staggered delivery and lag in delivery were consistent with expectations set at the time the purchase order was made. The commission does not consider that the staggered delivery or the actual delivery extending beyond the delivery date estimated on the purchase order undermines

¹⁸ Bisalloy Submission, EPR 638, item 31.

¹⁹ Bisalloy Submission, EPR 638, item 31, page 4.

SSAB's submission that the material terms of the purchase were established at the time of the purchase order.

Having assessed the information provided by SSAB AU, within the context of this case and how the facts are applied to the legislative requirements, policy and practice, the commission is satisfied that where the price and quantity on the sales invoice reflects the price and quantity on the purchase order (noting that staggered delivery was consistent with customer expectations at the time of ordering), that it is reasonable to conclude that the material terms of sale were established at the date of order.

The commission considers that such a finding reflects the specific circumstances of the sales the subject of this reinvestigation. Specifically, the commission notes that:

- SSAB AU claimed that the date of the purchase order was the date of sale of the product to the customer
- in response to the commission's requests, SSAB AU provided specific, detailed information in support of its claim
- due to the small number of transactions involved, the commission was able to interrogate the information provided by SSAB, including corroborating the claims with purchasers of the goods.

The commission finds that, in these circumstances, the appropriate point for price comparison is the purchase order date. The commission notes that for those sales invoiced where there is material difference in terms from the purchase order (relating to approximately 3% of the volume of sales), the purchase order is not a reliable indicator of the final terms of the sale and cannot be used for price comparison purposes.

2.3.1 Submission received on proper timing of price comparison test

Bisalloy's submission

While supporting the conclusion of PRR that the Minister's decision in relation to Continuation Inquiry 638 be affirmed, Bisalloy states in its submission to the PRR that the material terms of sale for the purpose for price comparison should be established at invoice date. Bisalloy's submission refers to the reasons provided in its previous submission as to why the invoice date should be the appropriate point for price comparison.²⁰

The commission's response

The commission has considered Bisalloy's submission and notes that Bisalloy does not provide any new information on this matter but rather refer to its submission of 28 April 2025. As the commission has had regard to Bisalloy's submission of 28 April 2025 when making its findings on proper timing of price comparison (section 2.2 refers), the commission therefore affirms the findings of the PRR.

²⁰ EPR 638, item 34

2.4 Section B: Exclusion of Pre-Inquiry Sales

The commission considers that a price undercutting analysis undertaken as part of a continuation inquiry is done for the purposes of informing its consideration of the likelihood of the recurrence or continuation of material injury in the absence of measures.

In that context, the commission has assessed the likelihood of the recurrence or continuation of material injury for the purposes of this continuation inquiry taking into consideration its obligations under sections 269T(2AD) and 269T(2AE) (as discussed in the ADRP's reinvestigation request at paragraph 28) in the context of a continuation inquiry. These sections expressly relate to the determination and attribution of material injury to dumping in the context of an investigation. A continuation inquiry examines the likelihood of the continuation or recurrence of material injury in the absence of measures.

The commission notes that a price undercutting analysis for the purposes of a continuation inquiry will generally be undertaken for the inquiry period, being the period most proximate to the impending expiry of measures. However, the commission also notes that a continuation inquiry will, at times, require the contemplation of the likelihood of the continuation or recurrence of material injury where no price undercutting analysis is possible, such as where there has been a cessation of exports following the imposition of measures. In this regard, the commission considers that a price undercutting analysis is not a mandatory form of analysis when contemplating the likelihood of the continuation or recurrence of material injury, but rather an analysis that forms part of a broader range of considerations the commission may undertake as part of its inquiry. It therefore follows that there is no mandated timeframe to which the commission must limit its price undercutting analysis, and no grounds upon which the commission is compelled to exclude the pre-inquiry purchase order sales identified by SSAB AU. The commission considers instead that the appropriate course of action is to include the sales that occurred during the inquiry period but for which the purchase orders were placed in the period prior to the inquiry period as part of its price comparability assessment.

The commission considers this approach to be consistent with principles raised by SSAB AU in its application to the ADRP (and reiterated in the RFI provided to the commission for the purposes of the reinvestigation). SSAB AU submitted that:

"At the time they were made, the 'common customers' to which the Commission refers, would have had the option of satisfying their requirements by purchasing from Bisalloy instead of SSAB, at whatever prices Bisalloy was offering at the time."

SSAB AU further submitted that:

"The simple fact of the matter is that the PO sales were contracted prior to the inquiry period. The price competition with respect to the wear plate as identified by

the Commission, purportedly indicating price undercutting by SSAB, did not exist. Any price competition with respect to those purchase orders took place before the inquiry period.”

For the purposes of revising the analysis undertaken in REP 638 to reflect the purchase order date as the appropriate date of price comparison, consistent with SSAB’s submission, the commission sought (among other information) purchase order information from both SSAB AU and Bisalloy that related to the pre-inquiry period to allow a proper comparison. The commission then conducted a price undercutting analysis using purchase order date as the date of comparison. This analysis was conducted within the context of the findings in REP 638 that:

- undercutting was evident only for wear grade Q&T steel plate
- the levels of undercutting were higher in respect of certain MCCs sold to certain common customers.

The approach adopted by the commission in conducting the price undercutting analysis is as follows. The commission identified from data submitted by SSAB AU that certain purchase orders had selling prices that were materially different to the sales invoice relating to that purchase order. The commission considered that this material difference in price invalidated those purchase orders from any comparison based on purchase order date (i.e. the price on the purchase order is not representative of the final price paid in relation to the supply of the goods). Having excluded those purchase orders the commission identified that:

- approximately 90% of purchase orders for wear grade Q&T steel plate related to 2 customers, both of which also source the goods from Bisalloy.
- approximately 80% of purchase orders for those 2 customers fell in 2 months only.

The commission also noted that for the 2 key months, the prices quoted for these customers were the same (or very similar) across multiple MCCs. This was a relevant consideration when the additional data requested from SSAB AU and Bisalloy was compared. For the 2 months where the majority of SSAB AU’s purchase orders were received, SSAB AU had 4 MCCs relating to those purchase orders, while Bisalloy only had a single comparable MCC. Noting the uniformity of prices across the 4 SSAB AU MCCs, the commission considered it reasonable to compare MCCs at a higher point of comparison (using MCC categories of grade, Brinell hardness and thickness) rather than the extended MCC which included width and length.

With these considerations in mind, the commission focussed its undercutting analysis on the higher level MCC, the subject of the vast majority of SSAB AU’s wear grade sales for those 2 customers and those 2 months.

The commission noted from Bisalloy’s data that while Bisalloy did not have purchase orders directly from either of those 2 customers in the 2 months identified, it did have purchase orders for other customers, and specifically a distributor that supplies one of the customers. The commission considers that the price listed on the purchase order for Bisalloy’s distributor represented a reasonable basis for the price comparison because:

- the Bisalloy purchase orders are contemporaneous with the SSAB purchase orders and therefore represent a reasonable indicator of the price Bisalloy was offering at the time SSAB AU secured sales with its customers
- the distributor was a purchaser of large volumes of Q&T steel plate from Bisalloy (a large volume purchaser is more likely to obtain price advantages relative to a smaller volume purchaser)
- the distributor was in the same state as the 2 customers identified, ensuring the price comparison includes the costs of transporting the goods to a comparable location.

The commission notes that the price to the distributor is at a different level of trade to the SSAB AU sales, however, considers it is nonetheless reasonable for the purposes of price comparability. This is because the commission considers that were Bisalloy to sell directly to the end customer rather than via the distributor, it would likely do so at a price at least equal to the price agreed with the distributor. The price would be potentially higher noting the distributor would be adding a margin in selling to the end user that would make its price to the end user higher than that which Bisalloy is selling to the distributor for.

The commission determined that, based on this comparison, SSAB AU undercut Bisalloy by between 7% and 9%. The commission's price undercutting analysis is contained in **Confidential Attachment 1** to this report.

The commission's finding that SSAB AU had undercut Bisalloy based on using the purchase order date as the relevant point of comparison is consistent with the finding of REP 638, though the commission notes the degree of undercutting using this approach is lower. The commission considers this revised analysis supports the finding in REP 638 that SSAB AU is prepared to price more aggressively where direct competition exists within the wear grade category. The commission therefore reaffirms the conclusions drawn in REP 638:

*"Noting that Bisalloy and SSAB are the largest suppliers of Q&T steel plate in the Australian market, and in the face of intense competition within the market, the commission considers that should the measures expire, SSAB AU will likely undercut Bisalloy in order to maintain or increase its market share. Specifically, the commission considers that if the measures expire, the competitive price advantage that SSAB AU currently maintains on wear plate would likely be even greater, while the premium it has on structural grade Q&T steel plate would likely be lessened, reducing the Australian industry's competitive advantage in relation to structural grade plate. In a price competitive market, the expiration of measures would therefore further increase the attractiveness of dumped exports from Sweden relative to the Australian industry's like goods."*²¹

The Commissioner has therefore found, upon reinvestigation, that the Minister's decision in Continuation Inquiry 638 should be affirmed.

²¹ REP 638 at page 79

3 APPENDICES AND ATTACHMENTS

Confidential Attachment 1	638 – Reinvestigation Price undercutting
Confidential Attachment 2	638 – Response to RFI received from SSAB AU
Confidential Attachment 3	638 – Response to RFI received from Bisalloy
Confidential Attachment 4	638 – Records of discussions with purchasers of the goods