

The Commissioner
Anti-Dumping Commission
Ground Floor Customs House Docklands
1010 La Trobe Street
Docklands VIC 3008

Level 3
500 Queen Street
Brisbane Qld 4001
Australia

GPO Box 2435
Brisbane Qld 4001
Australia

Attn: Ms Nicole Platt -Manager - Operations 2
By email to: nicole.platt@adcommission.gov.au

T +61 (0) 7 3028 2000
F +61 (0) 7 3028 2013

www.pacificaluminium.com.au

13 May 2014

Dear Ms Platt

Subject: Anti-Dumping Commission (ADC) - Anti-dumping Investigation into Silicon Metal exported from the People's Republic of China – Case 237

I refer to Public Record Document No. 017 on the ADC's Public Record for dumping and subsidisation investigation case 237 entitled:

"Visit Report - Importer
Pacific Aluminium

including Rio Tinto Aluminium (Bell Bay) Ltd, Boyne Smelters Ltd & Tomago Aluminium Company Pty Ltd"

(the "Visit Report").

On page 12 of the Visit Report, under "**4 AUSTRALIAN MARKET**", in the 5th paragraph, the 2nd, 3rd and 4th sentences state:

"Pacific Aluminium advised it understands that the Government of China regulates power usage for silicon plants and has begun implementing environmental controls which has increased the reliability of supply of silicon metal from China. Instead of many small silicon metal plants, China is moving to bigger plants with larger capacity furnaces. These can produce the required silicon metal grades at a cheaper price than can be provided by the Australian industry."

Pacific Aluminium wishes to clarify its position and now requests that those sentences be replaced with the following:

"Pacific Aluminium advises it understands that:

- *the Government of China has specific targets for improving national energy efficiency which will impact power usage by silicon plants. It is anticipated that silicon producers with smaller, less power-efficient furnaces will be required to install larger, more power-efficient furnaces; and*
- *the Government of China has also begun implementing environmental policies which will require silicon metal producers to install dust collection systems in silicon plants if they are not already in place.*

It is anticipated that the combined impact of these requirements will be to force some smaller silicon plants in China to close, with the shortfall in production to be made up by the silicon plants that have installed larger furnaces and which also have dust collection systems. Larger furnaces can produce the required silicon metal grades at a lower cost than smaller furnaces.”

Please contact us if you have any queries or require any further information in relation to the clarification recorded above.

Yours sincerely



Greg Stevens - Manager Procurement
Pacific Aluminium