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3 July 2015

Ms C Caballero
Director, Operations 3
Anti-Dumping Commission
55 Collins Street
Melbourne
Victoria 3000

By email

Dear Candy

Best Bar Pty Ltd - reinforced bar exported from Singapore Submission of OneSteel Manufacturing Pty Limited

We refer to the letter from OneSteel Manufacturing Pty Limited (“OneSteel”), dated 26 June 2015.

In that letter, OneSteel has requested that Best Bar Pty Ltd (“Best Bar”) provide further detail of the information that is shown as having been redacted from the non-confidential version of its material injury submission that was lodged on 3 June 2015.

OneSteel does not contend that the non-confidential summary of the information included in the non-confidential submission fails to contain sufficient detail to allow a reasonable understanding of the substance of that information.

We note that the information identified in OneSteel’s letter is information that OneSteel disclosed to the Commission in its application for this investigation, which is dated 4 August 2014. Specifically, we note that OneSteel provided the Commission with a copy of its “distribution agreement” and “customer price lists” for 2013/2014, in response to questions A-5.5 and A-5.6 of the application, as well as a monthly average price to distributors based on “OneSteel’s independents pricing and debar pivots worksheet” at Table A-9.2.1 of the application.

We also note that the Anti-Dumping Commission (“the Commission”) undertook to *examine the distribution relationship* between OneSteel and the single independent importer of the the subject goods which OneSteel had identified as having a distribution relationship with in its application.¹ Any robust examination of this distribution relationship would include a consideration of the terms of the contract creating the relationship and the prices offered throughout that relationship. Our understanding is that the examination of this distribution relationship took place during the Commission’s verification of OneSteel at the beginning of this year and prior to the lodgement of the material injury submission.

Having said that, Best Bar agrees that it is in the interest of all interested parties that the issues raised in its submission be given an appropriate consideration by the Commission. After all, OneSteel’s interactions with the Australian market for rebar need to be fully analysed by the Commission in its material injury consideration.

¹ Page 15 of the Consideration Report No. 264, interpreting OneSteel’s response to question A2(5) of the application.

Accordingly, in order to assist OneSteel in the preparation of any response to that submission, Best Bar has prepared the below table, which provides greater detail concerning the redacted information. This should allow OneSteel to have an even better understanding of Best Bar's submission, based on its own information. For the benefit of the other interested parties, this further detail is considered to be confidential between Best Bar and OneSteel, and therefore has been redacted from the non-confidential version of this submission.

[CONFIDENTIAL TABLE DELETED – further explanation of redacted information on pages 5, 6, 7, 8, 11 and 12 of Best Bar's injury submission]

We hope that this is of assistance.

Yours sincerely



Alistair Bridges
Senior Lawyer