



9 July 2014

Ms Kerry Taylor
Director Operations 3
Anti-Dumping Commission
1010 La Trobe Street,
Docklands Vic 3008
Australia

Operations3@adcommission.gov.au

Attention: Kerry Taylor

For Public File

Dear Ms Taylor,

Re: Quenched & Tempered Steel Plate exported from Sweden, Japan and Finland – Submission by Commercial Metals of 2 July 2014

Bisalloy Steel Group Limited (“Bisalloy”) has reviewed the submission by Commercial Metals Pty Ltd (CMC”) dated 2 July 2014. From the outset, Bisalloy totally rejects the arguments put forward by CMC that seek to justify the dumping of Quenched and Tempered (“Q&T”) steel plate in Australia.

(i) Alleged product differences

CMC has suggested that Bisalloy’s Bisplate 450 is over-specified when contrasted with the imported Japanese NSSMC products which are of a lesser grade. The Anti-Dumping Commission (“the Commission”) is aware that Bisalloy manufactures a range of Bisplate, including Bisplate 400 that is supplied into applications against the referred NSSMC Welten AR400E, Welhard 400 and ABREX400 grades.

Bisalloy manufactures and supplies equivalent grades to the dumped Japanese grades of Q&T steel plate.

(ii) Contracting market

Bisalloy has previously highlighted that material injury from dumping experienced in a contracting market has a far greater impact on the profit and profitability of the Australian industry than in a growth market. The magnitude of the dumping margins identified by the Commission combined with the large export volumes during the investigation period has caused significant financial damage to the Australian industry is also supported within the Commission’s Preliminary Affirmative Determination (PAD) report.

(iii) End of the ‘mining boom’

It is further suggested by CMC that the end of the mining boom has necessitated a reduction in costs for the sector i.e. reductions in prices of Q&T steel plate. Bisalloy has remained competitive with imported Q&T steel plate across the investigation period – even at dumped prices. As confirmed by the Commission, in the absence of dumping, Bisalloy is able to compete at profitable levels.

Therefore the suggestions by CMC that the requirements of the mining sector cannot be met by the domestic manufacturer are incorrect.

Closing comment

Bisalloy rejects the propositions put forward by CMC to justify Japanese Q&T steel plate exports at dumped prices. Bisalloy's historic performance and supply to all industry sectors on the Australian market are testament to Bisalloy's capability to supply.

Bisalloy also noted CMC's general comments in the Commercial Metals Importer Visit Report where CMC stated that "*the aggressive pricing of SSAB, **the price leader** in the Australian market contributed to Bisalloy's injury*" (emphasis added). CMC's comments highlight Bisalloy's long-held position that it is the dumped exports that have caused price depression in the Australian market. CMC's comments reinforce Bisalloy's long-held representations that the dumping by the nominated Q&T Steel Plate Exporter countries has and currently still continues to cause material injury to the Australian industry.

If you have any questions concerning this letter please do not hesitate to contact either myself on (02) 4272 0407 Mob: 0406317671 or Bisalloy's Consultant John O'Connor on (07) 3342 1931 Mob: 0411 252 451.

Yours faithfully,



Tom Matinca
Business Development and Strategy Manager
Bisalloy Steels Group Limited