



22 August 2014

NON-CONFIDENTIAL

Ms Candy Caballero
Director Operations
Australian Anti-Dumping Commission
Customs House
1010 La Trobe St
Docklands Vic 3008

Dear Ms Caballero,

**HOT ROLLED STRUCTURAL STEEL SECTIONS FROM JAPAN, KOREA,
TAIWAN AND THAILAND**

This submission, made on behalf of Siam Yamato Steel Co Ltd ("SYS"), is in response to OneSteel's letter of 13 August 2014.

Comparable domestic grade

Our submission of 31 July 2014 in response to the SEF does not argue that domestic grade SM490 is not comparable with export grade AS300, it merely makes the important point that in its SEF the Commission reported that **SS400 in the most appropriate grade sold on the domestic market of exporters from Japan, Korea, Taiwan and Thailand deemed suitable for like good comparison purposes** and yet used domestic sales of higher cost and price dual grade SS/SM400 to determine normal values for SYS' grade AS300 channel exports to Australia. This inconsistent approach to normal value determination in respect of SYS channel exports caused SYS' normal value and dumping margin to be higher than that of all other exporters. An unfair outcome.

Form of dumping duty

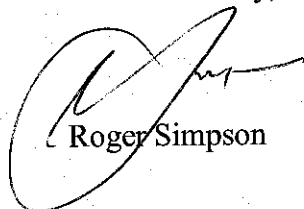
OneSteel's letter reinforces our submission of 4 August 2014 that it is seeking imposition of a form of dumping duty which imposes a penalty on SYS in addition to providing protection against unfair competition from dumped imports. OneSteel is clearly seeking a dumping duty which removes SYS' products from the Australian market rather than ensuring that they enter the Australian market at undumped prices and competition provided by them is fair competition – the objective of anti-dumping measures.

Due allowances

OneSteel obviously does not understand the grounds for our claim for a cutting cost adjustment.

Similarly, OneSteel does not understand the basis for our level of trade adjustment which it describes as a “novel claim” based on speculation of what might occur in a “fantasy domestic market”.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Roger Simpson', written in a cursive style. The signature is positioned above the printed name.

Roger Simpson