

19th September 2014

Mr Adam Yacono
Manager
Anti-Dumping Commission
C/o Australian Customs and Border Protection Service
Customs House
1010 La Trobe Street
DOCKLANDS VICTORIA 3008

Public File Copy

Dear Mr Yacono

**Hot Rolled Structural Sections exported from Japan, Korea, Taiwan and Thailand –
Submission by Government of Thailand**

I refer to the submission by the Government of Thailand (“GOT”) in respect of certain matters relevant to Statement of Essential Facts (“SEF”) No. 223 on hot rolled structural steel sections (“HRS”) exported from Japan, Korea, Taiwan and Thailand.

The GOT has requested the Commission to reconsider its findings on the issues raised. OneSteel has reviewed the GOT’s comments and recommends the Commission reject the claims made by the GOT. Each matter is addressed hereunder.

(i) Normal value (and dumping margin)

It is suggested by GOT that the Commission has not allowed certain adjustments to normal value for fair comparison purposes. OneSteel notes that the GOT has not provided the Commission with any additional information that would suggest that the Commission has erred in its preliminary finding(s). The GOT’s request for reconsideration therefore cannot be justified.

(ii) Material injury

The Commission’s findings that the Australian industry has suffered price depression and price suppression impacting profit and profitability confirms the Australian industry’s claims that the material injury experienced was driven by price-effect pressures. It does not necessarily follow that price undercutting will automatically result in a loss of sales volumes – particularly where the local industry is responsive to the prices of competitive imports.

OneSteel does not agree with the GOT’s assessment that the Australian industry should be a “price leader”. The volume of the dumped imports from Japan, Korea, Taiwan and Thailand throughout the investigation period was significant to influence prevailing industry prices.

The GOT’s comment concerning OneSteel’s integrated manufacturing process has been examined by the Commission. The Commission is satisfied that OneSteel has experienced material injury in its HRS operation from the dumped exports.

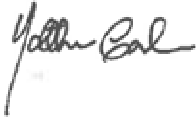
(iii) Other issues

In respect of the GOT’s comments concerning “the impact of the Australian dollar on exports of the subject goods” OneSteel would highlight that the Australian dollar depreciated against the US dollar during the 2013 investigation period. It would be expected that the exported goods would increase in Australian dollar terms throughout the period.

Finally, OneSteel concurs with the Commission's assessment of an unsuppressed selling price (ie the basis for a non-injurious price).

If you have any questions concerning this letter please do not hesitate to contact OneSteel's representative Mr John O'Connor on (07) 3342 1921 or Mr Matt Condon of OneSteel on (02) 8424 9880.

Yours sincerely,



Matt Condon
Manager – Trade Development
OneSteel Manufacturing Pty Ltd