Australian Government
Anti-Dumping Review Panel

Application for review of a Commissioner's decision

Customs Act 1901 s 269ZZQ

This is the approved[1] form for applications made to the Anti-Dumping Review Panel (ADRP) on or after 2 March 2016 for a review of a reviewable decision of the Commissioner of the Anti - Dumping Commission.

Section 269ZZO *Customs Act 1901* sets out who may make an application for review to the ADRP of a review of a decision of the Commissioner.

All sections of the application form must be completed unless otherwise expressly stated in this form.

Time
Applications must be made within 30 days after the applicant was notified of the reviewable decision.

Conferences
You or your representative may be asked to attend a conference with the Panel Member appointed to consider your application before the Panel begins to conduct a review (by public notice in the case of termination decisions and by notice to the applicant and the Commissioner in the case of negative prima facie decisions, negative preliminary decisions and rejection decision). Failure to attend this conference without reasonable excuse may lead to your application being rejected. The Panel may also call a conference after the Panel begins to conduct a review. Conferences are held between 10.00am and 4.00pm (AEST) on Tuesdays or Thursdays. You will be given five (5) business days' notice of the conference date and time. See the ADRP website for more information.

[1] By the Acting Senior Member of the Anti-Dumping Review Panel under section 269ZY *Customs Act 1901*.

Further application information

You or your representative may be asked by the Panel Member to provide further information to the Panel Member in relation to your answers provided to questions 10, 11 and/or 12 of this application form (s269ZZQA(1)). See the ADRP website for more information.

Withdrawal

You may withdraw your application at any time, by following the withdrawal process set out on the ADRP website.

If you have any questions about what is required in an application, refer to the ADRP website. You can also call the ADRP Secretariat on (02) 6276 1781 or email adrp@industry.gov.au.

PART A: APPLICANT INFORMATION

1. Applicant's details

Applicant's name: Commonwealth Steel Company Pty Ltd (trading as Moly-Cop Mining Consumables – Waratah Steel Mill)

Address: 2 Maud Street, Waratah NSW 2285

Type of entity (trade union, corporation, government etc.): Corporation

2. Contact person for applicant

Full name: [redacted]

Position: [redacted]

Email address: [redacted]

Telephone number: [redacted]

3. Set out the basis on which the applicant considers it is entitled to apply for review to the ADRP under section 269ZZO

The applicant for review was the co-applicant in relation to an application under section 269TB of the *Customs Act 1901* that led to the making of the reviewable decision – being a member of the Australian industry producing like goods.

4. Is the applicant represented?

~~Yes~~ No

If the application is being submitted by someone other than the applicant, please complete the attached representative's authority section at the end of this form.

Not applicable.

It is the applicant's responsibility to notify the ADRP Secretariat if the nominated representative changes or if the applicant become self-represented during a review.*

PART B: REVIEWABLE DECISION TO WHICH THIS APPLICATION RELATES

5. Indicate the section(s) of the *Customs Act 1901* the reviewable decision was made under

☐Subsection 269TC(1) or (2) – *a negative prima facie decision*

☒Subsection 269TDA(1), (2), (3), (7), (13), or (14) – *a termination decision*

☐Subsection 269X(6)(b) or (c) – *a negative preliminary decision*

☐Subsection 269YA(2), (3), or (4) – *a rejection decision*

☐Subsection 269ZDBEA(1) or (2) – *an anti-circumvention inquiry termination decision*

6. Provide a full description of the goods which were the subject of the reviewable decision

The goods the subject of the reviewable decision were:

> *"Ferrous grinding balls, whether or not containing alloys, cast or forged, with diameters in the range 22mm to 170mm (inclusive)"*

"The goods covered by this application include all ferrous grinding balls, typically used for the comminution of metalliferous ores, meeting the above description of the goods regardless of the particular grade or alloy content.

Goods excluded from this application include stainless steel balls, precision balls that have been machined and/or polished, and ball bearings."

7. Provide the tariff classifications/statistical codes of the imported goods

The goods are classified to the tariff subheadings in Schedule 3 to the *Customs Tariff Act 1995* specified below:

- 7325.91.00 statistical code 26
- 7326.11.00 statistical code 29
- 7326.90.90 statistical code 59 (additional tariff code identified by the Commission during the course of the investigation)

8. If applicable, provide the Anti-Dumping Notice (ADN) number of the reviewable decision
If your application relates to only part of a decision made in an ADN, this must be made clear in Part C of this form.

Anti-Dumping Notice (**ADN**) No. 2016/58

9. Provide the date the applicant received notice of the reviewable decision

6 June 2016

Attach a copy of the notice of the reviewable decision to the application
A copy of the notice of the reviewable decision is attached as *Appendix A* to this application.

PART C: GROUNDS FOR YOUR APPLICATION

If this application contains confidential or commercially sensitive information, the applicant must provide a non-confidential version of the grounds that contains sufficient detail to give other interested parties a clear and reasonable understanding of the information being put forward.

Confidential or commercially sensitive information must be marked '**CONFIDENTIAL**' (bold, capitals, red font) at the top of each page. Non-confidential versions should be marked '**NON-CONFIDENTIAL**' (bold, capitals, black font) at the top of each page.

For lengthy submissions, responses to this part may be provided in a separate document attached to the application. Please check this box if you have done so: ☐

10. Set out the grounds on which the applicant believes that the reviewable decision is not the correct or preferable decision

10.1 The Commissioner has failed or refused to consider whether or not the supplier of steel billet was a 'public body' or 'a private body entrusted or directed by' the government of China

In *Termination Report No. 316*[2], the Commissioner advised in relevant part:

> *"Where the grinding bar supplier was not the manufacturer of the grinding bar or steel billet used in that grinding bar, the Commission examined the information to the next level upstream supplier.* ***Those upstream suppliers were not listed as SIEs****.*
>
> *"The Commission is satisfied that its [the exporter, Longte] production of grinding balls towards the end of the investigation period was undertaken predominately from grinding bar purchased from its related party, Longteng. Longteng is not an SIE and manufactures its own steel billet. Similarly, the Commission established through verification that Xingcheng is a fully integrated producer of grinding balls and purchases the majority of its grinding bar from related parties.* ***Those related parties are not SIEs*** *and manufacture their own billet."*[3]
> [**emphasis added**]

The Commissioner appears to conclude on the basis of the above evidence that, since the steel billet suppliers were not SIEs, the conditions of a subsidy were not established under subsection 269T(1) of the *Customs Act 1901*[4]. With respect, the Commissioner has asked the wrong question. The correct question is whether or not the suppliers of steel billet are either:

> "(i) … a government of the country of export or country of origin of the goods; or
>
> "(ii) …a public body of that country or a public body of which that government is a member; or
>
> "(iii) …a private body entrusted or directed by that government or public body to carry out a governmental function…"

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[2] EPR Folio No. 316/051

[3] EPR Folio No. 316/051, p. 18.

[4] References hereinafter to legislative provisions, shall be a reference to provisions of the *Customs Act 1901*, unless expressly otherwise stated.

Therefore, the Commissioner has perpetuated an error in the interpretation of the legislation by limiting his consideration of *whether State Invested Enterprises are public bodies*[5]. The correct question for the Commissioner to ask is *whether each of the steel billet suppliers are public bodies,* <u>or</u> *private bodies entrusted or directed by the government of China or public body to carry out a governmental function*.

The Australian industry observes that the Commissioner correctly interpreted that WTO jurisprudence holds that majority ownership by a government of itself does not lead to a conclusion that an entity is a public body. Indeed, the Commissioner was also correct to consider the guidance set out by the Appellate Body in DS379[6] as to how it can be ascertained that an entity exercises, or is vested with government authority. However, the Commissioner failed to apply the guiding indicia referred to by the Appellate Body in DS379 that may help assess whether an entity is a public body to the actual steel billet suppliers. In failing to apply the *'public bodies test'* to the steel billet suppliers, the Commissioner committed an error of law. For completeness the Appellate Body in DS379 outlined the following indicia to help assess whether an entity is a public body (vested with or exercising governmental authority):

> *"Indicia 1 - where a statute or other legal instrument expressly vests government authority in the entity concerned;*
>
> *"Indicia 2 - where there is evidence that an entity is, in fact, exercising governmental functions may serve as evidence that it possesses or has been vested with governmental authority; and*
>
> *"Indicia 3 - where there is evidence that a government exercises meaningful control over an entity and its conduct may serve, in certain circumstances, as evidence that the relevant entity possesses governmental authority and exercises such authority in the performance of governmental functions"*[7]

In fact, the applicant for review submits that had the Commissioner applied the *public bodies test* to the steel billet suppliers, it would have been open to the Commissioner to conclude that they were indeed public bodies. The applicant for review here draws confidence for this conclusion from the Commissioner's proposed findings in *Statement of Essential Facts No. 316*[8] (***SEF 316***) on the question of the existence of a particular market situation in the Chinese iron and steel industry and related markets. When taken as a whole, the Commissioner's conclusions in relation to the interaction between the Government of China and both SIE and non-SIE steel industry members, support the existence of the three indicia outline in DS379.

Further, or in the alternative, even if the Commissioner failed to conclude that the steel billet suppliers in this case were in fact 'public bodies' as guided by the three indicia set out in DS379, the applicant for review submits that the Commissioner ought to have considered whether or not they

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[5] The Commissioner assessed whether State Invested Enterprises are public bodies in Appendix 3, EPR Folio No. 316/051, p. 80.

[6] Appellate Body Report, *United States – Definitive Anti-Dumping and Countervailing Duties on Certain Products from China*, WT/DS379/AB/R, adopted 11 March 2011 ("***DS379***").

[7] *DS379* at [318].

[8] EPR Folio No. 316/033.

were each 'a private body entrusted or directed by' the government of China. Again, the Commissioner failed or refused to turn his mind to this question, which is clearly relevant to establishing the existence of the alleged subsidy. Again, the applicant for review points to the evidence before the Commissioner on the issue of the existence of a particular market situation in the Chinese grinding ball market, and related upstream input markets. Specifically, the applicant for review points to the Commissioner's findings contained in *SEF 316* in relation to the influence and control exerted by the government of China:

> *"GOC directives: Summary of GOC influence*
>
> *"The Commission notes that the emphasis of these individual planning documents and directives is on promoting the orderly restructuring and reorganisation of the Chinese steel industry to better manage the issue of chronic oversupply. However,* ***these planning documents and directives also demonstrate the extent of the GOC's interventions within the Chinese steel industry****."*[9]

Accordingly, the applicant for review submits that on the evidence before the Commissioner, he ought to have considered, and concluded that the suppliers of steel billet in this case were either 'public bodies' or 'private bodies' entrusted or directed by the government of China to carry out a governmental function.

10.2 The Commissioner has failed or refused to adequately examine the pass-through of benefits by upstream suppliers of steel billet

10.2.1 *Pass-through of benefit of upstream products sold in arm's-length transactions between unrelated parties*

The Commissioner asserts that he is only required to examine the "pass-through of benefit to one level upstream". The Commissioner relies on "general practice as outlined in the *Dumping and Subsidy Manual*".[10] This view is incorrect and the Commissioner has committed an error of law in so concluding.

To be clear, the *Dumping and Subsidy Manual* does not direct the Commissioner to examine the pass-through of benefits to only one level upstream:

> *"18.3 PRACTICE*
>
> *"In considering whether there is "pass-through" the Commission will examine the transactions that take place between the input product on which the subsidy is paid and the final exported product.*
>
> *"This examination* ***might require sampling of those parties that are engaged in each step in the input process****...*
>
> *"****In most cases****, upstream subsidies will be investigated up to one level immediately preceding the point of producing the exported goods…*

[9] EPR Folio No. 316/033, p. 76.
[10] EPR Folio No. 316/051, p. 18.

> *"**However**, there may be some few **cases where it is appropriate to move up an additional stage**."*[11] [**emphasis added**]

Applied here, the practice and guidance provided by the *Dumping and Subsidy Manual* directly contradicts the Commissioner's interpretation. The applicant for review advised the Commissioner of his power to examine pass-through of benefit in the case of non-related suppliers of upstream products in its submissions in response to SEF 316, specifically:

> *"This is permissible under the SCM Agreement [[12]] as a 'subsidy bestowed directly **or indirectly upon the manufacture'**[13] [**emphasis added**]. Thus in US — Softwood Lumber IV,*[14] *the Appellate Body found:*
>
>> *'that financial contributions by the government to the production of inputs used in manufacturing products subject to an investigation are not, in principle, excluded from the amount of subsidies that may be offset through the imposition of countervailing duties on the processed product.'*[15]
>
> *"However, the amount of benefit said to pass-through to the allegedly subsidised goods must be tested:*
>
>> *'In our view, it would not be possible to determine whether countervailing duties levied on the processed product are in excess of the amount of the total subsidy accruing to that product, **without establishing whether, and in what amount, subsidies bestowed on the producer of the input flowed through, downstream, to the producer of the product processed from that input**. Because Article VI:3 permits off setting through countervailing duties no more than the subsidy determined to have been granted … directly or indirectly, on the manufacture [or] production … of such products, it follows that Members must not impose duties to offset an amount of the input subsidy that has not passed through to the countervailed processed products. Rather, '**[i]t is only the amount by which an indirect subsidy granted to producers of inputs flows through to the processed product, together with the amount of subsidy bestowed directly on producers of the processed product, that may be offset through the imposition of countervailing duties**.'*[16]
>
> "…where the upstream inputs are sold in arm's-length transaction to unrelated downstream parties, then the pass-through analysis is required in such circumstances. For example, the Appellate Body in *US — Softwood Lumber IV* concluded:
>
>> *'in cases where logs are sold by a harvester/ sawmill in arm's-length transactions to unrelated sawmills, it may not be assumed that benefits attaching to the logs (non-*

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[11] Australian Anti-Dumping Commission, *Dumping and Subsidy Manual* (November 2015) at pp. 109-110.

[12] *Agreement on Subsidies and Countervailing Measures (**SCM Agreement**)*

[13] [EPR Folio No. 316/038, fn 17] Footnote 36 [Article 10] of the *SCM Agreement*

[14] [EPR Folio No. 316/038, fn 18] Appellate Body Report, *United States – Final Countervailing Duty Determination with Respect to Certain Softwood Lumber from Canada*, WT/DS257/AB/R, adopted 19 January 2004 (***US — Softwood Lumber IV***).

[15] [EPR Folio No. 316/038, fn 19]*US — Softwood Lumber IV* at [140].

[16] [EPR Folio No. 316/038, fn 20] *US — Softwood Lumber IV* at [141].

> *subject products) automatically pass through to the lumber (the subject product) produced by the harvester/sawmill.'*[17]

The Commissioner's decision is therefore in breach of his own practice and guidelines and WTO jurisprudence on the examination of the pass-through of benefit of upstream products in arm's-length transactions to the non-related exporter/producer.

10.2.2 Pass-through of benefit of upstream products transferred between related parties

The Commissioner has failed to examine the pass-through of benefits between related parties, as in the case of fully-integrated manufacturers. Again the Commissioner has reached this conclusion in breach of his own practice and guidelines and WTO jurisprudence. Again, the applicant for review highlighted this error of law in its submission in response to *SEF 316*, specifically:

> *"The identity of the suppliers of grinding bar, and in turn their suppliers of steel billet is critical to the question of conferral and pass-through of benefit, as is analysis of the relationship between vendor and purchaser of each respective input product as it passes-through to the producer/exporter of grinding balls. Therefore, if the supplier of grinding bar is related to the exporter/producer of grinding balls, then the pass-through of the benefit conferred to the supplier of grinding bar may be said to have occurred (with limited controversy) under Article 10 of the WTO Agreement on Subsidies and Countervailing Measures (**SCM Agreement**). The Australian industry notes that although it is appropriate to treat multiple related entities as a single entity for the purpose of calculating dumping margins,*[18] *in the case of considering the pass-through of benefit within the context of the SCM Agreement, the transfer of upstream input product between related parties must still be distinguished. Therefore, if the "cooperative exporter" has identified the sale of steel billet to a related grinding bar producer, who then in turn transfers grinding bar to the grinding ball producer, then the issue of conferral and pass-through remains relevant, and cannot be collapsed into the treatment of a single transaction. What is not clear to Moly-Cop is whether the Commission has separately verified the sale of steel billet to the grinding bar producer, which is in turn transferred to the related grinding ball producer. In fact, the Commission is silent on this issue, which suggests that it has made the error of collapsing the related transactions into one."*

The Commissioner has clearly concluded that transaction did occur between these related entities, but concluded that there were not SIEs. However, confusingly, the Commissioner then cites the constraint placed upon him by "*general practice as outlined in the Dumping and Subsidy Manual*" that he is only required to examine "*the pass-through of benefits to one level upstream*".[19]

With respect, the Commissioner must resolve two issues relevant to the decision of whether or not the criteria of a countervailable subsidy have been established under subsection 269T(1):

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[17] [EPR Folio No. 316/038, fn 21] *US — Softwood Lumber IV* at [156] – [157].

[18] Panel Report, Korea – *Anti-Dumping Duties on Imports of Certain Paper from Indonesia*, WT/DS312/R, cited at *EPR No. 316/033* at 25 [5.9.2]

[19] EPR Folio No. 316/051, p. 18.

- firstly, whether or not there has been a financial contribution by a "public body", or "a private body entrusted or directed by the Chinese government or public body to carry out a governmental function", that involves the provision by that government or body of goods or services; and
- secondly, whether that financial contribution confers a benefit (whether directly or indirectly) in relation to the goods exported to Australia.

The existence of the latter is not a pre-condition to the former. The applicant for review submits that the Commissioner erred in his interpretation of the domestic legislation and WTO jurisprudence by failing to conclude that the pass-through of the benefit conferred to the supplier of grinding bar may be said to have occurred.

10.3 **The Commissioner has erred in his decision not to find that the provision of electricity by the Government of China at less than adequate remuneration (Program 2) was not regionally specific**

The Commissioner concluded that the applicant for review failed to:

> *"provide evidence that regionally specific electricity subsidies have been provided to manufacturers of grinding ball. The Commission is of the view that many factors will cause regional differences in electricity pricing"*[20]

With respect, the Commissioner has erred in his interpretation of section 269TAAC, and there determination of whether or not a subsidy is "specific" and therefore "countervailable".

In its response to SEF 316, the applicant for review set-out the WTO jurisprudence on the issue:

> "In SEF 316, the Commission held out the following reasons in support of this preliminary finding:
>
> > *'In the absence of a GOC response, the Commission sought to establish <u>if the grinding ball industry was eligible for a specific rate of electricity that was below the rate available to large industry</u>.*
> >
> > *'Provincial electricity tariff data was obtained for both the Jiangsu and Hebei provinces, the provinces in which the cooperating exporters are located, for both 2014 and 2015. The Commission compared the tariff data with the information supplied by each exporter and established that each exporter was subject to the tariff applicable to large industry. The tariff data indicated that certain industries were subject to preferential pricing, including the agricultural sector. <u>The tariff data did not indicate that the grinding ball industry was subject to specific or preferential pricing</u>.' [<u>emphasis added</u>]*
>
> Unfortunately, the Commission has erred in its assessment of the specificity of the alleged countervailable subsidy program. The Commission has tested the specificity of the program as it relates to a subset of enterprises within the region, **<u>but not</u>** whether the countervailable

[20] EPR Folio No. 316/051, p. 18.

subsidy was regionally specific. This approach is clearly at odds with WTO jurisprudence on this issue.

"In *EC and certain member States — Large Civil Aircraft*, the Panel concluded that Article 2.2 of the *SCM Agreement* provides that a subsidy available in a designated region within the territory of the granting authority is specific, even if it is available to all enterprises in that designated region:

> *'... when the text [of Article 2.2] is considered in its context and in light of its object and purpose, it is clear to us that Article 2.2 is properly understood to provide that a subsidy available in a designated region within the territory of the granting authority is specific, even if it is available to all enterprises in that designated region.'*[21][22]

Further, the Panel in *US — Anti-Dumping and Countervailing Duties (China)* also addressed the question whether a '*designated geographical region'* in the sense of Article 2.2 must necessarily have some sort of formal administrative or economic identity, or whether any identified tract of land within the territory of a granting authority can be a '*designated geographical region'* for the purposes of a specificity finding pursuant to Article 2.2. The Panel concluded that a '*designated geographic region'* in the sense of Article 2.2,

> *'can encompass any identified tract of land within the jurisdiction of a granting authority'*[23]

The Australian industry submitted evidence in support of the regional nature of this program.[24] In the absence of any verified contradictory evidence from the GOC, the Commission is obliged to assess the program as a regionally specific one.

The Commissioner has cited no reasons under subsection 269TAAC(3) that would invalidate the conclusion that the regional subsidy was specific. Further, the Commissioner fettered his discretion and did not consider the matters open to him to consider under subsection 269TAAC(4).

11. Identify what, in the applicant's opinion, the correct or preferable decision (or decisions) ought to be, resulting from the grounds raised in response to question 10

The correct or preferable decisions ought to be that the Commissioner concludes:

11.1 that the relevant suppliers of steel billet in this case were either 'public bodies' or 'private bodies entrusted or directed by' the government of China;

11.2.1 that the pass-through of benefit of upstream products sold in arm's-length transactions between unrelated parties has been conferred to the exporters/producers of the goods;

[21] Panel Report, *European Communities and certain Member States – Measures affecting trade in large civil aircraft*, WT/DS316/R, adopted 30 June 2010 (***EC and certain member States — Large Civil Aircraft***), at [7.1223]

[22] Upheld in Panel Report, *United States– Definitive anti-dumping and countervailing duties on certain products from China*, WT/DS379/R, adopted 22 October 2010 (***US — Anti-Dumping and Countervailing Duties (China)***), at [9.135].

[23] *US — Anti-Dumping and Countervailing Duties (China)* at [9.144]

[24] *EPR Folio No. 316/005* at p. 8.

11.2.2 that the pass-through of benefit of upstream products transferred between related parties has been conferred to the exporter/producer of the goods; and

11.3 that Program 2 was regionally specific and therefore a countervailable subsidy within the meaning of section 269TAAC.

12. Set out the reasons why the proposed decision provided in response to question 11 is materially different from the reviewable decision

Only answer question 12 if this application is in relation to a reviewable decision made under subsection 269X(6)(b) or (c) of the Customs Act.

The proposed decisions outlined in response to question 11, above, will materially alter the Commissioner's decision to terminate part of *Subsidy Investigation No. 316* as follows:

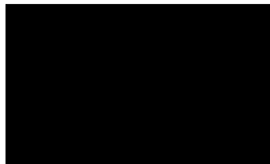
12.1 by reason of the correct or preferable decisions ought to have been found by the Commissioner (expressed as responses to question 11, specifically 11.1, 11.2.1, 11.2.2 and 11.3, above), in relation to the exporter, Jiangsu Yute Grinding International Co., Ltd, the Commissioner would have found that countervailable subsidies had been received in respect of the goods during the investigation period in such amounts as exceed the negligible level of countervailable subsidies of 2 per cent under subsection 269TDA(16)(b) and, therefore, the Commissioner would have been unable to terminate the subsidy investigation in accordance with subsection 269TDA(2) in so far as it relates to this exporter; and

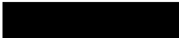
12.2 by reason of the correct or preferable decisions ought to have been found by the Commissioner (expressed as responses to question 11, specifically 11.1, 11.2.1, 11.2.2 and 11.3, above), in relation to the exporters, Changshu Longte Grinding Ball Co., Ltd, Jiangsu CP Xingcheng Special Steel Co., Ltd and Hebei Goldpro New Materials Co., Ltd, the Commissioner would have found that countervailable subsidies had been received in respect of the goods during the investigation period in such amounts as exceed the negligible level of countervailable subsidies of 2 per cent under subsection 269TDA(16)(b) and, therefore, the Commissioner would have been unable to terminate the subsidy investigation in accordance with subsection 269TDA(2) in so far as it relates to these exporters.

PART D: DECLARATION

The applicant/the applicant's authorised representative *[delete inapplicable]* declares that:

- The applicant understands that the Panel may hold conferences in relation to this application, either before or during the conduct of a review. The applicant understands that if the Panel decides to hold a conference *before* beginning to conduct a review, and the applicant (or the applicant's representative) does not attend the conference without reasonable excuse, this application may be rejected;
- The information and documents provided in this application are true and correct. The applicant understands that providing false or misleading information or documents to the ADRP is an offence under the *Customs Act 1901* and *Criminal Code Act 1995*.

Signature: 

Name: 

Position:

Organisation: Commonwealth Steel Company Pty Ltd

Date: 6 /07/2016

PART E: AUTHORISED REPRESENTATIVE

This section must only be completed if you answered yes to question 4.

Provide details of the applicant's authorised representative

Full name of representative: [redacted]

Organisation: [redacted]

Address: [redacted]

Email address: [redacted]

Telephone number: [redacted]

Representative's authority to act

A separate letter of authority may be attached in lieu of the applicant signing this section

The person named above is authorised to act as the applicant's representative in relation to this application and any review that may be conducted as a result of this application.

Signature: [redacted]

(Applicant's authorised officer)

Name: [redacted]

Position: [redacted]

Organisation: Commonwealth Steel Company Pty Ltd

Date: 06 /07/2016