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** In cooperation with
Trench, Rossi e Watanabe
Advogados

15 September 2020

Mr Gavin Jones and Ms Tessa Cramond
Merger and Authorisation Review Division
Australian Competition and Consumer Commission
Level 17, 2 Lonsdale Street
MELBOURNE VIC 3000

Dear Mr Jones and Ms Cramond

Steele Members Pty Ltd application for authorisation AA1000520 Response to submissions from interested parties

We refer to the application for authorisation made by Steele Members Pty Ltd (**Steele**) and its members.

Thank you for informing us of the public submissions from Croft Steel Traders Pty Ltd and Selection Steel Trading Pty Ltd in relation to that application (**submissions**).

Our client's respectful view is that the submissions do not raise any issues which should affect the ACCC's assessment of the authorisation application. From Steele's perspective, the key aspect of the authorisation application is the proposed joint selling conduct – which neither submission raises concerns with.

Steele and its members additionally seek authorisation to engage in collective bargaining conduct with various suppliers, including BlueScope (among others). The fact that Steele and its members have preferred suppliers is not directly relevant to the application. Further, the terms of any agreement reached with those suppliers, including the nature of any rebates negotiated for members, is outside the scope of conduct for which authorisation is sought.

Steele remains willing to provide the ACCC with further information if it would assist. Please contact us if you have any questions.

Yours sincerely



Lynsey Edgar
Partner



Jeremy Hardy
Associate

