



2, Pike Street, Rydalmere NSW 2116

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ABN 77 003 826 588

12th January 2016

Mr Gavin Crooks
Director
Operations 3
Anti-Dumping Commission
GPO Box 1632
MELBOURNE VIC 3001

Dear Sir,

Re: Imposition of Interim Dumping Duty of 6.8% on UTP HSS

We understand that the Anti-Dumping Commission has made a decision to impose a 6.8% interim dumping duty on hollow structural sections (HSS) exported to Australia by UTP from the UAE, following an application for protection by ATM.

On behalf of Firequip I would like to submit the following details for consideration against the imposition of dumping duty on the products we source from UTP:-

Approximately 50% of the fire protection products we supply are sourced from overseas, the majority of which cannot be sourced here in Australia. It is always our objective to align ourselves with reputable manufacturers and suppliers of quality products that conform to the various regulatory requirements and standards of the Australian market. Such was the case when we established a business relationship with UTP in 2010 for the supply of HSS – medium grade pipe to AS1074 and light wall pipe to AS2419.

Our continuing relationship with them is based on the fact that we are confident of their ability to consistently supply quality pipe that conforms to these requirements. It is our strong belief that in recent years we have seen an emerging trend of pipe coming into Australia from China and Korea that is being misrepresented on import in order to avoid anti-dumping measures imposed in 2012. Specifically we believe that some pipe is being classified for oil and gas applications (API pipe) and then being sold here, in Australia, for fire services applications. The avoidance of anti-dumping measures has only served to create a distortion in the market and driven pipe prices lower and lower.



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As a company we have been pro-active in highlighting this including the submission of several reports to Customs Authorities.

We have never found UTP's prices to be the lowest in the market nor has UTP ever put any pressure on us to purchase large volumes at heavy discounts. In fact, from time to time, we have found that the supply of UTP products has been delayed due to insufficient capacity at their mills.

A further point of note concerns the manufacturing processes employed by UTP in comparison to ATM specific to the hot dipped galvanising of HSS. UTP's galvanising process is conducted 'in-house', as opposed to ATM, who state that they use a third party for galvanising. As such, we would suggest that this represents additional input costs for ATM in terms of the logistics and handling of the pipe.

In conclusion, we do not believe that UTP has engaged in dumping of its HSS into the Australian marketplace. We further believe that imposition of any dumping duty, interim or otherwise would have a further detrimental effect on our market sector, particularly in the context of the suggested tactics being employed to avoid dumping duty on pipe from China and Korea.

Thank you for your consideration in this matter.

Yours Sincerely

A handwritten signature in black ink, appearing to read "W. Collins", written over a horizontal line.

Wayne Collins
General Manager
Firequip Pty Ltd