

Received: 4 December 2015

PUBLIC RECORD

4 December 2015

Ms Melissa Guilfoyle
Case Manager
Anti-Dumping Commission
55 Collins Street
Melbourne VIC 3000

By e-mail: operations9@adcommission.gov.au

Dear Ms Guilfoyle

Enquiry EX 0042 – Response to Supplementary Submission from Gadens Lawyers

We wish to respond to the supplementary submission ('EX 0042 Doc. No. 006') lodged by Gaden Lawyers on 5 November, 2015.

Specifically, Austube Mills ('ATM') would like to make the following clarifications/observations on EX 0042 Doc. No. 006:

- (1) "Cold drawn" products are manufactured by reducing the diameter of Electric Resistance Welded ('ERW') pipe through a subsequent, additional cold drawing process. This is different to "cold-forming" which refers to the forming process employed for the manufacture of ERW Hollow Structural Sections ('HSS'). The Australian Standard covering the manufacture of structural ERW HSS manufactured by the cold-forming process is AS/NZS 1163:2009 *Cold-formed structural steel hollow sections*. Product manufactured to AS/NZS 1163:2009 are not "cold drawn" making the description used in EX 0042 Doc. No's. 001 and 006, and the now revoked TC 9508551, not applicable to the RMS Standard compliant products described in Ex 0042 Doc. No. 006.
- (2) The RMS Standard only considers HSS Grades C250 (or C250L0) and C350 (or C350L0). These HSS grades are from AS/NZS 1163:2009 as there are no other HSS product Standards referring to these grade designations. Indeed, sub-paragraph 3(d)(x) of EX 0042 Doc. No. 006 specifically notes that the HSS goods in question need to comply with AS/NZS 1163:2009. There is no mention of "cold drawn" product in the RMS Standard and in fact cold drawn product would in all likelihood not comply with the RMS Standard requirements.
- (3) We further note that specified tensile strength (or presumably yield strength) of 235-240 MPa does not meet the RMS Standard or any specified grade within AS/NZS1163:2009. This is further exemplified by the Test Certificate from Tianjin Qunshengda Steel Pipe Co., Ltd contained in EX 0042 Doc. No. 001 which

indicates the HSS goods in question would not be compliant with AS/NZS 1163:2009 nor the requirements of the RMS Standard.

- (4) Austube Mills produces and offers for sale HSS products manufactured to AS/NZS 1163:2009 Grade C250L0 and Grade C350L0 in the following finishes:
- non-coated
 - primer-painted,
 - pre-galvanised to AS/NZS 4792 (DuraGal Plus), and
 - Hot-dipped galvanised to AS/NZS 4680 and meeting the requirements of AS/NZS 4792.
- (5) Any concerns over size range availability can be negotiated provided minimum order quantities are met. ATM has the capability of manufacturing all size, grade and coating configurations listed in the RMS Standard.
- (6) It is disingenuous on Page 7 of EX 0042 Doc. No. 006 to suggest that ATM HSS manufactured to AS/NZS1163:2009 Grades C250 or C350 and hot-dip galvanised to AS/NZS 4680 does not meet the requirement of the RMS Standard. The RMS Standard is predicated on the ATM range and consequently the ATM HSS does meet the requirements of the RMS Standard and is available for sale.
- (7) Page 10 of the submission states that galvanising takes place after the holes are drilled in the product. The Australian industry has the capability of, and is willing to accept an order for, hot-dip galvanising to AS/NZS 4680 undertaken after drilling of holes and ATM would be pleased to introduce Australian distributors / fabricators capable who offer this service.

In conclusion, there are no grounds for an exemption to the Dumping Measures being granted.

If you have any questions concerning this letter please do not hesitate to contact my colleague Mr Arun Syam on (02) 8424 9834.

Yours sincerely



Brett Willcox
Manager – Operations and Support Services