131 Clayton Street BELLEVUE WA 6056

PHONE (08) 9274 2632 FAX (08) 9274 6618 FREECALL 1800 633 666



20th October, 2014

"PUBLIC FILE VERSION"

Kasia Nominees Pty Ltd (trading as DE Engineers) refers to its application for ministerial exemption of goods from Dumping and Countervailing Duty Notices applying to certain Hollow Structural Sections (HSS) exported from China, Korea, Malaysia and Taiwan, dated 9 December 2013.

Kasia Nominees refers to the Commission's Record of Meeting (released 16 May 2014) with representatives of the sole objecting domestic industry in this matter, OneSteel Australian Tube Mills (ATM).

The Record of Meeting provides information concerning ATM's view of product types and their production capacity, and acknowledges that the types of galvanised pipe may be classified into three categories:

- Pre- or in-line galvanised (zinc coating mass of approximately 100g/m2);
- Semi-automatic or air-blown hot dipped galvanised (zinc coating mass of approximately 300g/m2);
- Batch hot dipped galvanised galvanised (zinc coating mass of between 500 600 g/m2).

ATM further acknowledges that it produces in Australia:

- Pre-or in-line galvanised CHS; and
- Batch hot dipped galvanised CHS (via an external galvaniser).

ATM acknowledges that it has fully decommissioned its capacity to produce air-blown galvanised CHS in Australia.

It is noted that ATM believes that "a reasonable amount of imported HDG HSS... may be batch-galvanised and not air-blow" [emphasis added].

For the avoidance of doubt, Kasia Nominees is only interested in obtaining a Ministerial Exemption in relation to air-blown hot dipped galvanised CHS, as identified by the zinc coating mass of approximately 300g/m2.

Accordingly, Kasia Nominees seeks to clarify the scope of the description of the goods subject to the exemption application, as follows:

The exported goods to which the application relates are electric resistance welded pipe made of carbon steel, comprising circular and hollow sections normally referred to as CHS (circular hollow sections) having a nominal size (NB) of either 25, 32, 40 or 50 millimetres exported to Australia from China, Korea, Malaysia and Taiwan comprising ALL of the following:

- (a) an air-blown hot-dipped galvanised finish;
- (b) a zinc coating mass of 300g/m2.

For the purpose of this description, tolerance allowance for (a) & (b) are +/- 10%.

We trust that this now addresses any residual concerns of the Commission regarding the goods proposed to be subject to the exemption.

Kind regards,

Kevin Prater General Manager