



**Whites Group Pty Ltd** ABN 25 001 845 478

Tel: 1300 559 732 Fax: 1300 559 762

DIRECTOR, OPERATIONS 4

LEVEL 10, INDUSTRY HOUSE

10 BINARA STREET

CANBERRA ACT, 2601

**PUBLIC RECORD**

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**PUBLIC RECORD**

**ANTI DUMPING NOTICE No 2015/152**

Whites Group is a family owned company that offers a wide range of products to the garden, hardware and rural markets across Australia. Our products are designed to be sold through distributors such as Bunnings, Mitre 10 in hardware and companies such as CRT and Landmark for rural products.

Whites Group (Whites) has been identified as an importer of steel reinforcing bar in the current investigation however we believe that there are strong reasons as to why the products we are importing and should be excluded from the dumping action and any future dumping margins. In summary the reasons are as follows;

- 1) The reinforcing bar that Whites import and resell is designed as a retail pack for sale and use in the general hardware market. It is not imported in 6m to 15m lengths as specified in the application
- 2) The rebar imported by Whites is not made to particular standards nor has ACRS certification as it is for general hardware use.
- 3) Whites would pay a premium of 20- 30% more than the rebar identified in the application. This premium takes into account the small volume purchased, the extra work in preparing the product for sale in the hardware industry.

#### **WHITES REINFORCING BAR.**

Whites Group imports a very small quantity of reinforcing bar compared with the overall market ; however the product size, specification, packing, labelling, and usage is designed for general distribution and for sale to the general public through stores such as Bunnings and Mitre 10. The possible end uses for the product in this form is extremely broad and not just for the concrete reinforcing sector.

We believe that the product imported by Whites has a number of distinctive differences to the product referred to in FORM B108 – APPLICATION FOR THE DUMPING AND/OR COUNTERVAILING DUTIES NOV 2015.

Para 3) (1) ONESTEEL application states that the product is made to Australian Steel Reinforcing Standards AS/NZS 4671.2001 and in addition the product has ACRS certification. The commission's assessment tends to confirm the fact that ONESTEEL rebar is made to an Australian standard and that the imported bars in question are made to a comparable standard.



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*The Whites product is not produced to a standard as it is not regarded as a specific concrete reinforcing bar product; it could be used in a wide range of possibilities from a tent peg to a sculpture. In addition the Whites product does not have ACRS certification as it is again not relevant to the end use.*

Para 3 (2) ONESTEEL application refers to typical lengths of REBAR being 6, 9, 10, 12, and 15 metres. ONESTEEL has attached a "REODATA SPECIFICATION" document which confirms that the product is sold in 6 to 15m lengths.

*The Whites rebar product is sold in lengths from 300mm to 1800mm long as it is designed as a retail pack for retail outlets. Each piece or pack has a descriptive color label with a bar code for retail use. Three of the rebar products that are imported are packed in cardboard boxes, so they can be placed on shelves easily. (Appendix 1)*

Para A-4 1. ONESTEEL describe their rebar product "is primarily purchased by rebar fabricators and steel service centres who typically process it before supplying into the residential, commercial and engineering sections". Onesteel sell to account customers and make no mention of the retail market.

*Whites rebar is sold to hardware chains such as Bunnings where it is then sold directly to the broad retail market. I.e. the man on the street rather than specific industry accounts such as fabricators or steel service centres.*

#### SUPPLY SOURCE OF MATERIAL

White's usage of rebar is extremely small by tonnage, and also in a length and form that is non-standard to the typical steel mill products available. As such Whites do not typically purchase product directly from the steel mills and in addition we pay a premium of between 20- 30 % to the typical product identified in the application. This premium includes packing in a format that is suitable for display and sales in the hardware industry.

As such we do not believe we are importing product at levels that would be considered as constituting "dumping". We can provide evidence of our volume and the price which we believe will support our claim. (See attached)

By categorizing all the rebar products to the concrete/construction industry as described by the Applicant(ONESTEEL) and as also described in subsequent Anti-Dumping documentation we believe is unfairly punishing companies like Whites that have developed a specific market not serviced by the likes of the applicant. In addition we believe our purchasing cost is at a premium level that does not constitute "dumping" and we are effectively being punished for developing a niche business in these products.

Yours Faithfully

Brian Gray

Innovation and Technical Development Manager