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PUBLIC VERSION

01/02/2016

The Director
Operations 4
Anti-Dumping Commission
Industry House, Level 10
10 Binara Street
Canberra ACT 2600

By email: operations4@adcommission.gov.au

Dear Sir

**Anti-Dumping Notice No. 2015/152 (Case Number 322)
Investigation Into The Alleged Subsidisation of Rebar Exported to Australia From China**

We refer to the Anti-Dumping Commission (ADC) investigation into the alleged subsidisation of steel reinforcing bar exported to Australia from the People's Republic of China which follows an application by OneSteel Manufacturing Pty Ltd (OneSteel) for the publication of a countervailing duty notice.

We thank you for providing us with an opportunity to make a submission in respect to the current investigation and provide herein information regarding the goods imported from China by Hickory for use in its patented structural building system.

HBS Construction Technology

Hickory's patented building technology delivers an innovative, technological alternative to the construction of medium and high-rise residential, hotel and student accommodation projects.

Our integrated structural system ("HBS") accelerates onsite and off-site construction programs by up to 60%, minimising material and energy waste, whilst maximising quality and safety.

HBS is designed to be a superfast structural building system that allows us to erect a building faster than using conventional building practices. Essentially, Hickory has designed a prefabricated structural formwork system which is made in a manufacturing facility in Melbourne and transported to the building site and immediately erected. HBS consists of structural columns, precast concrete floor, pre-attached façade and complete bathroom pods that are delivered to site as structural units preloaded with plasterboard walls.



Hickory.

Importation of Rebar

In the Anti-Dumping Notice No. 2015/152, the "Goods" the subject of the application are specified as:

"Hot-rolled deformed steel reinforcing bar whether or not in coil form, commonly identified as rebar or debar, in various diameters up to and including 50 millimetres, containing indentations, ribs, grooves or other deformations produced during the rolling process. The goods covered by this application include all steel reinforcing bar meeting the above description of the goods regardless of the particular grade or alloy content or coating."

Whist Hickory imported products that somewhat meet the description of "the Goods" under tariff classification 7214.20.00 with statistical code 47, they were not imported in coil or straight lengths in raw form. Rather, the Goods were fabricated in China into large reinforcing matts with RHS and sheet steel shutters as part of our overall prefabricated HBS system. A copy of the shop drawings and photographic evidence of these fabricated assemblies are attached for your information.

The fabricated large reinforcing panels with RHS and sheet steel shutters are used by Hickory in its HBS system to provide a shutter for shotcrete application to walls (a spray on application of concrete). Shotcrete is an unconventional methodology for high rise apartment construction in Australia which is why we sought offshore expertise to supply and fabricate these panels.

Hickory is committed to promoting Australian manufacturing and following our first project we have since re-modelled our system to ensure it is compatible with locally sourced and fabricated reinforcing bar without the need to procure from international suppliers.

If you have any queries, please feel free to contact the undersigned.

Yours faithfully

HICKORY BUILDING SYSTEMS PTY LTD

PER: 

Todd Chadwick
Production Manager