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Date: 25th October 2011

Reference:

Director Operations 3
 International Trade Remedies Branch
 Australian Customs and Border Protection Service
 Customs House
 5 Constitution Ave
 CANBERRA ACT 2601

FOR THE PUBLIC RECORD

Dear Mr Wickes

Australian Customs Dumping Notice 2011 / 43

What has changed since the last investigation that has given OneSteel Australian Tubemills Pty Ltd (OneSteel) the opportunity to again disrupt small and medium enterprise business's (SME). Once again SME will not be able to buy with certainty the product they need to carry on in business, (for fear of dumping duties), until this enquiry is completed, and we all know that this is quite an extended period. Why can't measures, if dumping is found, be imposed in a suitable timeframe after a final decision has been given? The current system only gives OneSteel the regular opportunity to disrupt the business activities of it's competitors who we mention employ many Australians over a diverse employment landscape.

We understand OneSteel would like to have the Australian Industry to itself, without competitors, and this is where we are headed if they are successful in having their regular dumping application accepted for investigation. SME cannot continue to survive if their supply of product is regularly interrupted by dumping investigations.

Supplier to the Wire, Steel and Fencing Industries

October 31, 2011

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No doubt OneSteel will have business strategies to promote their business at the expense of its competitors and this strategy of regular applications for Dumping will be one of them. Every business should have a business strategy but they should not include manipulation and abuse of Government procedures at the expense of other Australian Businesses who also employ many other Australians.

We know the Australian Government wants to protect jobs, but in this instance if it allows this dumping application to proceed it risks many SME's either closing down or moving offshore leaving OneSteel with a virtual monopoly.

Why is there no pressure on OneSteel to prune its Admin and other Internal expenditures to match that in SME workplace surely if they did this they would be more competitive. The dot points claimed for material injury are not only peculiar to OneSteel given the problems with the Global Financial Crisis, and problems in the European Economic Union etc.

They claim reduced employment however we feel the reduction in employment will be worse in the SME workforce and ancillary services.

They claim reduced profits, return on Investment, attractiveness to Invest etc however that is not peculiar to OneSteel only. Their internal operating costs should be investigated, particularly in the wasteful middle management area which is generally not found in SME. Why should SME pay a dumping duty to bring costs up to a point where OneSteel can continue to pay higher than necessary internal costs.

What is "Normal Value" as stated in the second paragraph of the ACDN 2011/43. Normal value for who?

Please advise what "non galvanised HSS" means. We feel it may include Black, Powdercoated, Painted but if there are others please advise.

Given the rules of application for Dumping please advise and or publish details of the following as it relates to the applicant - OneSteel:

1. Where in Australia is every individual item of the Goods in every type of finish subject to this dumping application manufactured in Australia;
2. What volumes are made? ie confirm sufficient quantities to adequately supply the Australian market;
3. How regularly do they make it? ie confirm there are no high and low periods of stock availability;

October 21, 2011

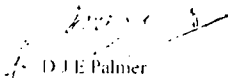
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We have no problem with the theory of the need for Dumping duties however object to the blatant misuse of the current system by OneSteel to stymie SME in their ordinary course of business.

If OneSteel do not meet the above minimum criteria then a dumping enquiry should not even commence as eligibility to apply has not been established.

Please advise.

Yours sincerely



D J E Palmer

Director