

PUBLIC FILE

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24 November 2011

Director Operations 3:  
Attention: Mr Geoffrey Gleeson  
International Trade Remedies Branch  
Australian Customs and Border Protection Service  
Customs House  
5 Constitution Avenue  
CANBERRA ACT 2601

**Re: Australian Customs Duty Notice (ACDN) No 2011/43 – Hollow Structural Sections**

I am writing to draw your attention to a problem with the above mentioned dumping investigation. It relates to the inclusion, in the range of products under investigation, of post Hot Dipped Galvanised Pipe (HDGP).

Although Onesteel ATM did make this product during the period in which dumping is alleged to have occurred, they stopped producing it prior to the commencement of the investigation. The closure of the facility which used to produce it is, as I understand permanent, although Onesteel ATM say it has been mothballed.

It is also a well known fact that Onesteel ATM have been importing HDGP from Vietnam, which country has been excluded from the investigation. How can it be that they can import significant quantities of HDGP from one country but claim that they are suffering from dumped imports, from other countries? Surely the relevant legislation disallows such anti-competitive behaviour.

Onesteel ATM do not produce any like goods to HDGP and they acknowledge that it is a unique product range for which there are no substitutes. This is evidenced by the attached pages which I sourced from their website today.

As Onesteel ATM no longer produce HDGP nor any substitutable products I urge you to exclude it from this investigation. To do otherwise would run contrary to the intent of the relevant regulations and would be anti-competitive by giving Onesteel ATM a commercial advantage over all other importers of HDGP.

Your urgent attention to this matter would be greatly appreciated.

Yours faithfully,  
AMITY PACIFIC PTY LTD



Keith Dennis  
Managing Director



**SALES: 1800 281 424**  
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  - > **Oil**
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Products

**Product Coatings | Hot Dip Galvanized**

**HOT DIP GALVANIZING**

When your job requires longer lasting protection, make sure you use Hot Dip Galvanized galvanized finish products. All weather, all conditions, Hot Dip Galvanized is made to last.

Hot-dipped galvanized inside and out to the highest relevant standard, Hot Dip Galvanized coatings provides excellent protection against the forces of nature and chemical degradation whilst ensuring a longer life-span.

Its track record in a wide range of applications and locations in Australia, New Zealand and South-East Asia makes it the first choice of builders and specifiers. Hot Dip Galvanized is manufactured and tested to meet the requirements of Section 2 of AS/NZS 4792. The pipe is coated to a minimum mass of 300 g/m2 each side.

Hot Dip Galvanized products are the result of many years of use in various industries so you know that they meet your needs of reliability and quality.

**Specifications and Standards**

Hot Dip Galvanized is manufactured and tested to meet the requirements of the following specifications:

- > Section 2 of AS/NZS 4792 – Hot-dip galvanized (zinc) coatings on ferrous hollow sections, applied by a continuous or a specialized process.
- > Minimum Coating Mass: 300 g/m2 each side.

Further processing and using Hot Dip Galvanized products Hot Dip Galvanized products are suitable for use in a wide range of specific pipe-related applications. The process to manufacture Hot Dip Galvanized products uses a batch type hot-dip galvanizing method which also uniformly controls the zinc thickness.

As Hot Dip Galvanized is supplied 'fully' galvanized, the joining or processing of these products is more economically done if the zinc coating is not destroyed- e.g. by not preparing for welding. As a result, Hot Dip Galvanized products lend themselves to fluid conveyancing (pipe) applications where joining is done by mechanical means – e.g. joints with roll grooves, swaged joints, threaded, etc. See the OneSteel Australian Tube Mills Product Manual for details on these types of 'end' finishes.

Due to its thicker zinc coating, Hot Dip Galvanized can be used in harsher atmospheric environments except for severe corrosion cases. It is also suitable with top coats for use in more aggressive environments. AS/NZS 2312 should be consulted for the appropriate use of Hot Dip Galvanized which has the system designation of 'HDG300' (see Clause 5.5 of AS/NZS 2312).

Hot Dip Galvanized is also supplied with a smooth clear polymer coating to resist premature weathering and white rust. It is easy to use, and can be joined and formed by common pipe system fabrication techniques. Forming, cutting and drilling is very similar to SupaGal<sup>®</sup> type tubular products.

Though possible with some surface preparation, Hot Dip Galvanized products are generally not welded. See the OneSteel Australian Tube Mills Product Manual for Welding Information and the Material Safety Data Sheet on Hot Dip Galvanized tubular products.

OneSteel Australian Tube Mills Hot Dip Galvanized products generally have a clear polymer coating applied to the outside surface. The mill-applied coating is a water dispersible resin emulsion used to protect the

OneSteel Australian Tube Mills

zinc surface from corrosion after manufacture through to transport and distribution. Removing the clear polymer coat can be done by various methods. These methods include caustic bath (cold and hot), solvent wash (Toluene, MEK etc.) paint stripper and mechanical removal (sandblast, grinding etc.). Apart from mechanical methods, these removal procedures may require up to 15-30 minutes fluid removal contact time. If required, a clear coat polymer coating removal procedure is available from your OneSteel Australian Tube Mills representatives.

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