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12 December 2016

The Director
Operations 4
Anti-Dumping Commission
GPO Box 1632
MELBOURNE VIC 3001

Our ref: RXW
Matter no:
Your ref: ADC 355

By email: operations4@adcommission.gov.au

FOR PUBLIC USE

Attention Mr Jukka Mantynen

Dear Mr Mantynen,

Submission – Slotted Angle Shelving

We act for Geelong Holdings Limited (**Geelong**) and its related parties.

We refer to the ADC Team Briefing prepared by Summit Select Pty Ltd (**Summit**) dated

29 November 2016 (**Briefing**). The purpose of this submission is to address comments made by Summit in the Briefing regarding slotted angle steel.

Please note, while we do not agree with other comments made by Summit in the Briefing, we consider that our views on those other matters have been addressed in Geelong's exporter questionnaire and subsequent submissions.

On page 6 of the Briefing Summit claims that slotted angle has "unique pre-punched holes". Geelong again asserts that "slotted angle" is not a term that has a clearly accepted meaning within Australia. Assuming that the reference by Summit to "slotted angle" is to the products made and/or imported by its related companies, Geelong submits that there is nothing unique about the pre-punched holes.

If there was a unique quality about the pre-punched holes in slotted angle steel, presumably Summit would have described the excluded goods by reference to this characteristic, rather than use the vague term "slotted angle". Rather than simply accept the assertion that slotted angle steel is characterised by unique pre-punched holes, we request that the ADC obtain from Summit a description of the hole punching unique to slotted angle shelving and an explanation of what makes that hole punching unique.

Below is an image previous provided by Summit as an example of slotted angle steel. We cannot discern a unique element of the hole punching of the steel strips on the below image. In fact, the 40 mm x 40 mm strip contains hole punching that is very similar to most pre-punched steel used in the construction of nut and bolt steel shelves.

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Below is an image of various pre-punched steel strips. To help our understanding, we would be grateful if Summit could provide its view as to which of the below is, and is not, slotted angle steel, and, assuming it is not all slotted angle steel, what is the distinguishing characteristic.



We also wish to highlight that in its original application, Summit described slotted angle steel as "*steel strips with holes punched in them with a right angle bend down the middle*" (**Previous Description**). Based on the images provided by Summit in subsequent submissions, this appears to be a clear description of what is meant by "slotted angle shelving". As previously submitted, it also describes most steel used in steel shelving imported by Geelong.

The Previous Description was not included in the Briefing. It would assist if the ADC could inquiry with Summit as to whether it has abandoned the Previous Description or whether it still maintains that definition is appropriate.

Please contact us if you have any questions.

Yours faithfully
Hunt & Hunt



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Principal

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