24 February 2023

The Director
Investigations
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

By email: investigations@adcommission.gov.au

Dear Director

This submission is made in response to the Australian industry questionnaire responses in relation to Exemption Inquiry EX0093 – hollow structural sections from China, Korea, Malaysia and Taiwan by:

- Orrcon Manufacturing Pty Ltd (Orrcon) dated 12 August 2022
- Austube Mills Pty Ltd (ATM) dated 12 August 2022.

Orrcon Manufacturing Pty Ltd - Questionnaire Response

The following comments are made in reply to the Orrcon Questionnaire Response:

At Question D1 Orrcon claim the following:

> The description of the goods which are the subject of this exemption inquiry as described by the applicant is extremely broad and in effect covers all pipe and tube products that are domestically manufactured by Orrcon Manufacturing Pty Ltd.
>
> The domestic manufactured range of CHS, RHS and non-RHS, include the following product brands:
>
> - ULTRASPEC-GAL® and MECSPEC-GAL® coated pipe and tube are an identical range of products with a Z275 hot dip galvanized (**HDG**) coating, i.e. a total coating mass of 275 g/m^2.
> - ALLGAL® coated and SMARTCOTE® painted tubular range of are like or directly competitive goods.
> - Refer Non-Confidential *Attachment 1 - Product Catalogue - Manufactured Range Extract*

It seems that Orrcon have misunderstood the specific goods description and the locally manufactured requirement in this Exemption Application as they do not manufacture goods

that are like or directly competitive to the goods subject to this application. Orrcon Steel Distribution import a high volume of **identical goods** to this application as offered in its Coatings and Finishes Brochure and sell them in Australia as part of their product offering. This is undisputable proof by Orrcon that HDGP-cold blown tube is not identical to and is generally not a substitute for Australian produced tube.

DE Engineers strongly disagrees with the assertion that Orrcon's **manufactured in Australia** products with a 275g/m hot dipped (HDG) coating are equivalent to the **imported** cold-blown hot-dipped galvanised pipe (HDGP-cold blown) products with a 200-300g/m^2 surface coating, inside and out (total coating mass 400-600g/m^2).

The imported cold blown hot dipped galvanised pipe has a total coating of 400-600g/m^2 compared to any of Orrcon's Australian made product range with a maximum total coating of 275g/m^2. Orrcon's comparison is misleading and false as it fails to differentiate between the combined mass of coating on the inside and outside of the tubes.

For Question D2 Orrcon responded with the following table:

Characteristics	Description
Australian Standards	AS/NZS 1163 and AS1450
Electric resistance welded pipe made of carbon steel	ERW (Electric Resistance Welded) process
CHS (circular hollow sections)	CHS (circular hollow sections)
RHS (square or rectangular)	RHS (square or rectangular)
Trapezoidal hollow sections	Silo Tube and or special sections
Hot-dipped galvanised finish	Hot dipped zinc coated to AS 1397
Zinc coating mass	MECSPEC-GAL® and ULTRASPEC-GAL® are pre-galvanized pipe and tube range manufactured to AS/NZS 1163 from AS 1397 Z275 steel coil. ALLGAL® is an electo-galvanized pipe and tube range manufactured to AS/NZS 1163 and AS4750 ZE50/50.
Able to be manipulated – bent and shaped	Yes
Able to be directly welded	Yes

In its response Orrcon seems to be trying to confuse the reader by stating the characteristics for their hot-dipped galvanised steel described as hot dipped zinc coated to AS 1937. This classification is for pipe made from galvanised **steel strip** with a **maximum outside total coating mass of around 138g/m^2** and the exemption we are seeking is for hot-dipped galvanised sections that are dipped in molten zinc with the excess blown off resulting in a surface coating in excess of **200-300g/m^2 on both sides (total coating mass 400-**

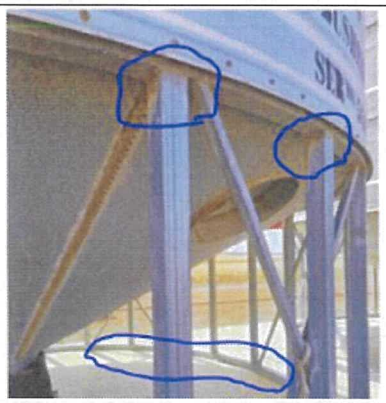
600g/m^2), normally referred to as hot-dipped galvanised pipe so in all references we will refer to this as **HDGP-cold blown** to prevent confusion.

DE Engineers manufacture and sell HDGP-cold blown manufactured silos and bins with a 20-year manufacturer's structural warranty, with the expectation the product will last more than 50 years. The silos and bins made from ATM and Orrcon Australian manufactured material would not be expected to last more than half this period.

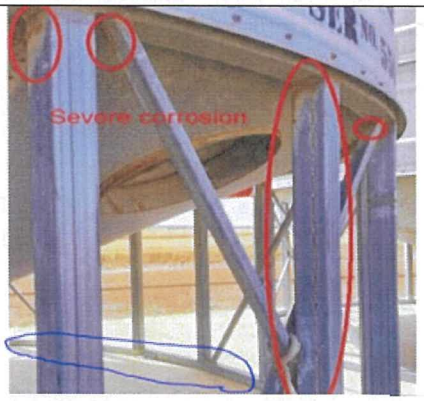
DE Engineers sealable silos are guaranteed to be made stronger and to last longer with a 20-year structural Warrantee http://www.deengineers.com.au/products/rural-silos/

At Question F1 the following comments were included from Orrcon:

> The below images (picture 4 and 5) from the applicant's submission identifies red-rust corrosion occurring on both ALLGAL® and DURAGAL® products:



Picture 4. This picture shows a relatively new silo around 15 years old made from ALLGAL® with significant corrosion of the silo legs.



Picture 5. This picture is a close up of rusted Duragal® 15 year silo stand.

> There is corrosion occurring at the welded connection between the vertical post and silo section, as identified in blue and red. It should be understood that the welding process vaporizes the zinc coating in the region of the weld zone, so these photos only provide evidence of inadequate repair or maintenance to the heat affected weld zone. This region is readily accessible, and a low-cost repair method such as a wire brush and cold-galvanized spray would provide satisfactory ongoing protection of these welded connections. This situation would apply to all finish types.

The above statement by Orrcon that this situation would apply to all finish types is a false statement. Pictures 4 and 5 clearly show red rust more than 25mm away from the weld connection and down the length of the steel tube. These pictures clearly demonstrate the rusting of the silo legs has very little to do with weld preparation and repair.

The Orrcon response highlights the fact that the ALLGAL or DuraGal (Picture 5) needs ongoing repair and maintenance whereas the HDGP-cold blown (see Picture B, page 6 below) does not. Even when the weld on HDGP-cold blown is not coated after welding the weld area and surrounding material does not corrode as it does with ALLGAL or DuraGal because of the sacrificial nature of the heavy zinc coating that will turn white at the edge of

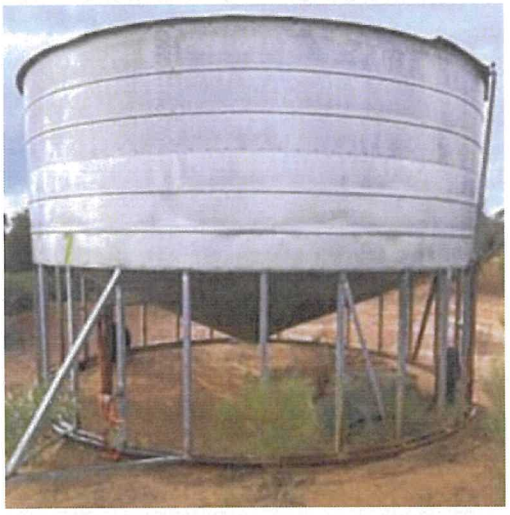
the weld. That is, this rusting does not occur with HDG pipe and there is no need for repair and maintenance making it suitable to all environments.

Hot-dip galvanizing protects steel in three main ways including zinc-iron alloy layers and uninform and complete coverage, but perhaps the most notable way is by acting as a sacrificial coating;

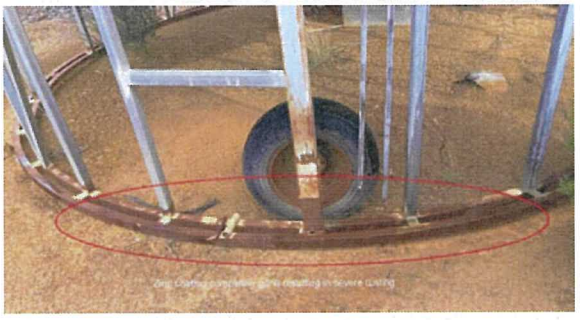
> "Because zinc is anodic to steel, even if the durable intermetallic layers of the hot-dip galvanized coating are damaged … adjacent zinc will sacrificially protect the exposed steel." American Galvanisers Association

In picture's 4 & 5, above there is no evidence of corrosion on the base ring as the silos in question are physically located on top of a concrete base. In contrast, the silos installed directly on top of soil (picture's 3 & 7 below) exhibit the complete loss of the zinc coating and the onset of red rust. This highlights the impact of service conditions and the choice that can be made to mitigate the effect of corrosion by placing the silo on a concrete pad.

Further, the installation of a silo directly on the ground does not comply with the Owners Responsibilities as outlined in *Attachment 6 – DE Engineers Silo Operation Manual*. The extract from this operational manual below further states that the failure to adhere to instructions will void the warranty. So while the applicant may make claims of premature corrosion in this instance, the fact that the silo was installed directly on the ground clearly voids their own warranty.



Picture 3. This picture shows an older silo made from ALLGAL® square tube with the zinc coating completely gone on the base ring and substantial corrosion on the legs compared to pipe frame silos.



Picture 7. This picture is a close up of rusted Duragal® silo stand.

3. Owners Responsibilities

It is the responsibility of the owner to ensure this silo is set up correctly. Many problems result from incorrect preparation of the silo base pad. Silos have been mounted on plough discs, sleepers, poor quality concrete, un-reinforced concrete or even directly on the ground. The results of incorrect mounting have sometimes been total collapse of the silo.

Elevated silos are a fully stressed structure, engineered to support grain in a vertical plane with pressure exerted and distributed evenly around the base support frame. A pad that is not level will transfer the weight of the grain to the low side of the silo and place excessive stresses on the lower sheets of the silo. An uneven pad will also increase the pressure in one area, twisting the base frame deforming the silo. The effects may not be seen for some time, probably not until extra stress is placed on the silo wall when out loading product with a higher bulk density. This localised force may burst seams or compressed lower sheets causing the silo to tilt and possibly collapse. Check with your silo manufacturer if you are planning to store a commodity heavier than usual.

Elevated Silo Pad

The most important step in establishing a silo is to construct a good quality pad. The site selected for erection of the silos should be a stable, level site with no chance of erosion from water run off. Care must be taken in sitting the silo to avoid soft and expanding soils. Consult the local shire engineer for advice on the strength of the subsoil at the site. For establishment on a difficult site the farmer should engage the services of a consulting engineer.

Site preparation

Clear vegetation from an area 1 m (3 ft) larger than the pad, grade it 100 mm (4") below ground level to provide a level area for the slab and adequate drainage away from the pad edges. A layer 30 - 50 mm (1 1/2 - 2") deep of good draining material (sand or blue metal dust) should be placed on the base and compacted by watering and rolling. Alternatively in a clay area place a plastic ground sheet on the
compacted soil to help prevent drying and cracking of the subsoil and pad. Construct the concrete pad exactly to manufacturer's instructions. Failure to adhere to instructions will void the warranty.

Extract from *Attachment 6 – DE Engineers Silo Operation Manual.*

The above statements about silos installed directly on top of soil with references to pictures 3 and 7 followed by an extract from the DE Engineers Silo Operation Manual for elevated silos are very misleading.

Pictures 3 and 4 are pictures of Field Bins. Field Bins account for around 50% of our silo range. Field Bin silos are designed to be mobile and placed directly to the ground while in use. As per Orrcon's own product brochures Australian made ALLGAL is not suitable for products placed directly on to the ground. Here is a link to the DE Engineers Field Bin Manual. There is no requirement for field bins which are designed to be mobile to be placed on a concrete pad. Only elevated silos need to be placed on a concrete foundation.

At this stage it is worth noting that elevated grain silos are installed directly on to concrete pads is also not recommended by Orrcon without coating the surface where the steel touches the concrete. On top of the concrete is also an area where water can pool, again it is not recommended by Orrcon to use ALLGAL in this situation.

Pictures 3 and 7 are further evidence that the ALLGAL or DuraGal that was used to construct the frame for these field bins is not fit for purpose.

As noted above, in its Questionnaire Response Orrcon highlighted the requirements of the DE Engineers Silo Operation Manual and the owner's responsibility to ensure the silo is set up correctly on a concrete pad. The Manual front cover has a picture of elevated silos. See Picture A below. The new silos shown in this picture are made from imported HDGP-cold blown square tube with a surface coating in excess of 200g/m^2.

Picture A: Silos set up on concrete pads

The next 2 pictures are of a silo that De Engineers manufactured in 1980, now 42 years old. The pipe base made from HDGP-cold blown has not been painted or the welds repaired for 42 years as it is unnecessary when HDGP-cold blown is used.

Picture B. HDGP-cold blown silo stand, built in 1980.

Picture C. Underneath the silo top ring (where the body is joined) built in 1980.

This picture of a 42-year-old silo subject to highly corrosive coastal wind 20km from the coast in Esperance, is a good example of how HDGP-cold blown is welded to painted pipe (at the top) where the painted pipe has rusted very badly with no sign of brown rust on the galvanised pipe leg and weld – unlike the ALLGAL or DuraGal silos in our application (refer Pictures 4 and 5, reproduced above.)

Picture D. Silo make from DuraGal

This picture of a silo manufactured from Australian made DuraGal was supplied to a farmer in WA that is stamped with a manufacturers date 24/8/2011. This silo has **severe** red rusting on all components.

Picture D clearly shows that after only 12 years of service the square silo legs and trapezoidal section under the silo cone made from DuraGal have **severe corrosion**. In contrast, the DE Engineers silos constructed from HDGP-cold blown as demonstrated in picture B and picture C (above) show **no signs of corrosion** whatsoever after 40 years of service. In summary these pictures clearly show that DuraGal, with a maximum outside total coating mass of around 138g/m^2, is no substitute for HDGP-cold blown, with a surface

coating in excess of 200-300g/m^2 on both sides (total coating mass 400-600g/m^2), when used in all environments.

Further on, in the Additional Comments, Orrcon makes the following claim regarding Confidential Attachment 5.

> There is a significant amount of information made available by Orrcon Steel in the public domain for manufacturers and end-users of HSS products to make fit-for-purpose decisions around the type of finish that can be used for HSS. *Confidential Attachment 5 – Email communication* further details the acceptance of MECSPEC-GAL by the applicant as a suitable alternative. Orrcon Steel has made public a range of information, including product guides and flyers concerning fit-for-purpose durability considerations in regard to the range of its products: ALLGAL®, ULTRASPEC-GAL® and MECSPEC-GAL®.

In reference to the assumption that Attachment 5-Email communication: Please note that DE Engineers have asked for quotes to supply Mecspec-Gal only to gather evidence on the specifications, availability and price and **under no circumstances would we use this material in silo construction because of its poor corrosion resistance**.

Orrcon also make the claim that it is not clear why or on what basis the applicant included additional sections in the definition of the exempt goods, see below.

> The description of the goods in the application covers all HSS sections, yet the basis of the applicant's approach to Orrcon Manufacturing Pty Ltd related to only HDG CHS. It is not clear why or on what basis the applicant included in their definition of the goods the additional sections of RHS and non-RHS (trapezoidal) sections.

DE Engineers have been manufacturing silos and field bins from HDG-cold blown pipe for more than 40 years as it is a superior material to Gal tube in terms of corrosion resistance as shown in our application. We have included other hollow section in our application because we now manufacture silos and field bins from HDG-cold blown pipe square, rectangular and trapezoidal hollow sections for ease of manufacturing.

Lastly, regarding the comment in our application that we understood Bluescope to part own a steel mill in China that manufactures and supplies HDGP to the Australian market.
DE Engineers acknowledges this understanding is incorrect.

> Finally, Orrcon refers to the applicant's statement below (page 4, paragraph 7) of the application. The applicant makes the claim that BlueScope is a part owner of a tube mill in China that manufactures and supplies HDGP to the Australian market. This claim is false, and Orrcon requests that the Commission revert to the applicant and query why this statement was made.
>
> mostly from BlueScope. It is DE Engineers' understanding that BlueScope part owns a steel mill in China that exports to Australia and supplies a major percentage of HDGP 200-300g/m^2 to Australian steel manufacturers for distribution to the Australian market. DE Engineers also imports HDGP from China with other Australian suppliers of pipe importing from Pakistan, India, Korea and Vietnam.

Our suppliers gave us this information. It is understood that Bluescope has a number of factories in China that produce sheeting but not pipe so we retract that statement.

In summary, it is DE Engineers position that the goods manufactured in Australia by Orrcon are not like or directly competitive. We refer to Orrcon's website where they are referring to supplying hot dipped galvanised products, i.e., HDGP-cold blown, to meet its high standards of finished products against all weather conditions

. https://www.orrconsteel.com.au/products/coatings-finishes-available

HOT DIPPED GALVANISED COATINGS & FINISHES

Hot Dip Galvanised finished products are perfect for jobs that require longer lasting protection against all weather and all conditions. HDG is suitable for use in a wide range of pipe related applications. Orrcon Steel Distribution imports Hot Dipped Gal Products from reputable overseas suppliers that meet our high standards of finished product.

DE Engineers believe that the above statement by Orrcon is further proof that Australian made products like Mecspec-Gal and ALLGAL with lighter zinc coatings are not a suitable substitute for HDGP-cold blown when used in all weather conditions and all conditions as are our agricultural products.

Austube Mills response

The following comments are made in reply to the ATM Questionnaire Response:

At question D1 regarding selling goods that are like or directly competitive to the goods subject to this application for exemption ATM responded with the Following:

> YES. Austube Mills Pty Ltd (**Austube Mills**) produces and sells in Australia goods that are like or directly competitive to the goods subject to this application for exemption.

Like Orrcon, it seems that ATM have misunderstood the specific goods description and the locally manufactured requirement in this Exemption Application as they do not manufacture goods that are like or directly competitive to the goods subject to this application. As noted above Orrcon Steel Distribution import a very significant quantity of **identical goods** to this application and sell them in Australia as part of their product offering.

At question D2 ATM provided the following description of the goods it manufactures in Australia.

> Austube Mills produces like or directly competitive goods to the goods subject to this application for exemption. These are sold and marketed under the 'DuraGal' brand.
>
> DuraGal products are electric resistance welded pipe made of carbon and alloy steel, comprising circular and hollow sections normally referred to as CHS (circular hollow sections), RHS (square or rectangular) and trapezoidal hollow sections that are galvanised for corrosion protection.
>
> Please see the attached *Product Availability Guide* (NON CONFIDENTIAL ATTACHMENT 1) for the full Austube Mills product range.

Characteristics	Description
Electric resistance welded pipe made of carbon steel,	Identical
comprising circular and hollow sections normally referred to as CHS (circular hollow sections), RHS (square or rectangular) and trapezoidal hollow sections	Identical section shapes
an air-blown hot-dipped galvanised finish;	Hot dipped galvanised
a zinc coating mass of 200-300g/m2.	A minimum zinc coating mass of 100gm2 or a minimum zinc coating mass of 135g/m2

In this response ATM seems to be trying to confuse the reader by stating that the characteristics for their hot-dipped galvanised steel (zinc coating total mass of 200-300g/m^2 inside and out) described as hot dipped zinc coated that is pipe made from galvanised steel strip with a maximum outside coating of around 138g/m^2 and the exemption we are seeking is for hot-dipped galvanised sections that are dipped in molten zinc with the excess blown off

resulting in a surface coating in excess of 200-300g/m^2 on both sides, (total coating mass 400-600g/m^2), normally referred to as hot-dipped galvanised pipe (HDGP-cold blown).

With regard to Part E which addresses ATM's capability to produce identical or like or directly competitive products ATM are claiming that they have sold like or directly competitive goods to the goods the subject to this application for an exemption.

PUBLIC RECORD

PART E – Capability to Produce Identical or Like or Directly Competitive Products

E.1

If your company has not produced and sold in Australia products that are identical to, or like or directly competitive to the goods subject to this application for exemption, is your company capable of producing such goods?

Not applicable as Austube Mills has sold like or directly competitive to the goods subject to this application for exemption.

☐ Yes

☐ No

E.2

If you answered yes to question E.1, indicate whether the product that you can produce is identical to, or like or directly competitive to the goods subject to this application for exemption.

Not applicable as Austube Mills has sold like or directly competitive to the goods subject to this application for exemption.

E.3

If you are capable of producing identical, like or directly competitive goods, explain why you have not produced such goods.

Provide evidence of your production capability, including evidence of the production and sale of similar products, certification of the identical, like or directly competitive goods and at what cost they could be produced, as well as any plans for the imminent production of the goods or orders for the goods and any relevant information.

Not applicable as Austube Mills has sold like or directly competitive to the goods subject to this application for exemption.

E.4

If you are capable of producing identical, like or directly competitive goods, provide reasonable evidence of likely terms and conditions of sale for these goods.

Not applicable as Austube Mills has sold like or directly competitive to the goods subject to this application for exemption.

These statements are false as Austube Mills **do not manufacture in Australia HDGP-cold blown products**.

At part F – Additional comments - ATM Make claims that have been blanked out and do not provide us with the opportunity to refute.

> Clear evidence that AustubeMills' DuraGal galvanized electric resistance welded hollow structural sections are like or directly competitive to the exemption goods is that three of the largest Australian manufacturers of [redacted] all specify and use Australian made DuraGal product which competes against the imported product used by DE Engineers. These large [redacted] manufacturers purchase the DuraGal range from Austube Mills distribution customers.
>
> See CONFIDENTIAL ATTACHMENT 5 for evidence of end use application of DuraGal demonstrating like or directly competitive goods to that of DE Engineers (at the 30 sec point, the line marking shows DuraGal Plus material).

Out of the 3 largest silo manufacturers in WA only one these uses Australian made tube (DuraGal). This manufacturer though a large producer of silos sells mostly silos for on farm storage in the central wheatbelt, well away from corrosive coastal winds. while DE Engineers are the largest producer of commercial silos in WA with approximately half of the elevated silos produced for feeding animals including chicken, cattle and pigs in intensive breeding situations, install large amounts of silos close to the coast including [redacted] that are all within a couple of hundred metres of the ocean, on farms with very high coastal winds from Esperance to Northampton and have silos installed on the wharf at Albany, Bunbury and Fremantle. These silos are all installed in very high corrosive areas that DuraGal should not be used as per ATM's recommendations. While it is acknowledged that some Eastern States manufacturers use Duragal some (including the largest company) paint the square tube in effort to try to increase the life of the product.

Field Bins account for around 50% of DE Engineers silo range. Field Bin silos are designed to be mobile and placed directly to the ground while in use. As per ATM's own product brochures 'Australian made DuraGal is not suitable for products placed directly on to the ground. Only elevated silos need to be placed on a concrete foundation. At this stage it is worth noting that Elevated grain silos are installed directly on to concrete pads which is also not recommended by ATM without coating the surface where the steel touches the concrete. On top of the concrete is also an area where water can pool, again it is not recommended to use DuraGal in this situation.

Further on in the Additional Comments section, ATM refer to Kasia Nominees broadening the description of the goods and tries to somehow link the description of the exempt goods to an 'even more tenuous' claim that there are no like or directly competitive goods. This link does not make sense.

> Austube Mills notes that in their latest application for exemption, Kasia Nominees, rather than narrowing the description of the exemption goods, have surprisingly broadened the description of the goods which makes their claim that there are no like or directly competitive goods even more tenuous.

Kasia Nominees T/A DE Engineers believe that the previous exemption EX0015 was denied because of false and misleading information similar to some of the information supplied by Austube Mills in this response. The decision not to grant the previous exemption does not prevent further applications for exemptions being considered.

Prior to submitting this new application, we have been advised that though we could not appeal the previous decision we can make a new application in which we can bring to the attention of the Commission the false and misleading information that is and has been supplied to the Commission by other parties.

Further on in the Additional Comments section ATM attempted to undermine our application with the following comments

> Based on HDG corrosion rate data obtained from the Galvanizers Association of Australia's *Guide to the durability of hot dip galvanized steel*, Edition 3.1, July 2021, the corrosion rate of hot galvanised coatings in contact with soil is 2 – 6 micron/year. For a 50 year lifespan, the required zinc coating is 700 to 2,100 g/m2.
>
> It is evident that a HDGP coating of 200 – 300 g/m2 would not meet the DE Engineers 50-year coating life requirement. As such, the performance of Austube Mill's like or directly competitive goods provide comparable corrosivity performance to the claimed exempt goods.

This final statement is very misleading as DE Engineers have HDGP-cold blown silos that are 30-40 years old with little to no corrosion and though our silos have a structural warrantee for 20 years they are expected to last more than 50 years. We see this as further proof offered by ATM that DuraGal or Galtube is not identical and cannot be substituted for HDGP-cold blown: if you were to use the above guide supplied by ATM, silos made from DuraGal with 100g/m2 coating on the outside would only last 2-7 years while a HDGP-cold blown silo made with 200g/m2 would last 4.7-14 years and a 300g/m2 coating would last 7-21 years.

It is DE Engineers position that the goods manufactured in Australia by ATM are not like or directly competitive. We refer to ATM's website and the following extracts from the ATM Product Manual June 2016 and the ATM Product Availability Guide (November 2020)

DuraGalPlus Finish

CHS to Grade C350LO with DuraGalPlus finish is manufactured using steel strip that has the following coating thickness:

- Minimum coating mass ___ 100 g/m^2 each side
- Designated as _____ AS/NZS 4792 ZB 100/100

See the Austube Mills Product Availability Guide for further information on availability.

HotDipGal Finish

- Galvanized (Hot-dip)

CHS to Grade C350LO with HotDipGal finish is manufactured and tested to meet the requirements of Section 2 of AS/NZS 4792.

- Minimum coating mass_____300 g/m^2 each side
- Designated as _____ AS/NZS 4792 HDG 300

The coating adherence of the galvanizing is satisfactory for the CHS to be bent to a radius 6 times the diameter of the CHS up to 60.3 mm OD in accordance with AS/NZS 4792.

See the Austube Mills Product Availability Guide for further information on availability.

Product Availability Guide

Notations and Abbreviations

Standard Surface Finishes	Description
DuraPrimed	DuraPrimed products are primer painted for protection during storage and handling.
DuraGal	DuraGal products are hot-dip gal to Section 3 AS/NZS 4792 ZB 100/100 with a minimum average zinc coating of 100g/m² on both the internal and external surfaces.
DuraGal ZB 135/135	DuraGal products are hot-dip gal to Section 3 AS/NZS 4792 ZB 135/135 with a minimum average zinc coating of 135g/m² on both the internal and external surfaces.
DuraGalClear	DuraGalClear products are hot-dip gal to Section 3 AS/NZS 4792 ZB 100/100 with a minimum average zinc coating of 100g/m² on both internal and external surfaces. Ideal for powder coating.
Hot-dip gal	Hot-dip gal pipe galvanized both inside and out to AS/NZS 4680.
Oiled	Oiled products have a light protective oil coating and comes standard on selected products.
Clear	Clear products are coated with a temporary rust preventative.

DE Engineers believe that the above statements by ATM are further proof that Australian made products like DuraGal with lighter zinc coatings are not a suitable substitute for HDGP-cold blown when used in all weather conditions such as the conditions where our agricultural products are used.

It is worth noting that ATM's Product availability Guide does not provide any indication to customers that the hot-dip gal pipe (galvanised both inside and outside) is imported and not produced in Australia. We are aware that customers are unknowingly using this imported material to manufacture all weather products that are being promoted as being produced from all Australian made steel.

Finally, DE Engineers notes that neither Orrcon or ATM addressed in their respective submissions the significant quantities of imported HDG cold-blown pipe in square and rectangular sections, distributed by both, to meet the need in the market for HDG cold-blown pipe products. It is difficult to understand why on one hand the local industry is arguing that its Australian made steel is directly competitive to imported HDG cold-blown pipe and yet on the other hand they are importing significant quantities of HDG cold-blown pipe, the exempt goods the subject of this application, to specifically address the corrosion requirements SME manufacturers, like DE Engineers, require to produce steel products for all weather conditions.

Please let me know if you have any questions on the above.

Yours sincerely