

26 March 2024

Investigations Unit 2
Anti-Dumping Commission
GPO Box 1632
Melbourne Victoria 3001

Public File

Dear Director,

Exemption EX0099 – Hollow Structural Sections exported from China, Korea, Malaysia, and Taiwan

1. Introduction

Orrcon Manufacturing Pty Ltd (**Orrcon**) is a member of the Australian industry manufacturing hollow structural sections (**HSS** and/or **the goods**). Orrcon makes the following comments in relation to exemption inquiry EX0099.

2. Revised exemption goods description

Orrcon has reviewed the revised exemption goods description and notes that Orrcon still retains an objection to how the goods are described.

Specifically, Orrcon notes that revised goods description (whilst stipulating they now must be internally grooved) indicates that the goods are produced to the European Norm standard EN 10305. The use of **EN 10305** would be far too broad as it applies to the entire suite of precision and mechanical tube specifications, many of which apply to Orrcon's existing product range.

Furthermore, Orrcon understands that the applicant Schiavello Manufacturing Pty Ltd (**Schiavello**) imports under the Japanese Standard **JIS G3445**. [**confidential text deleted**: provision of commercially sensitive documentation].

Orrcon would hence agree to the following further revised exemption goods description:

Steel electric resistance welded pipe, circular, seamless, JIS G3445 Standard, cold drawn, internally grooved, in the following sizes:

- 51.0 mm Outside Diameter x 47.0 mm Inside Diameter, Wall Thickness 2.0mm
- 63.5 mm Outside Diameter x 59.5 mm Inside Diameter, Wall Thickness 2.0mm
- 76.2 mm Outside Diameter x 72.2 mm Inside Diameter, Wall Thickness 2.0mm

Having all of the following specifications:

- Length ranging from 4.0 metres to 5.8 metres or from 5.8 metres to 8.9 metres;
- Surface roughness (Ra) no greater than 1.6 micrometres;
- Outside and inside diameter tolerance no greater than +/- 0.1mm;
- Straightness tolerance 0.1mm; and
- E355-SR grade steel (JIS G3445 STKM 11A-E-C), cold drawn and stress relieved in a controlled atmosphere.

The exemption goods are classified to the tariff subheading 7306.30.00 (statistical code 31 and 34) for circular tube of Schedule 3 to the Customs Tariff Act 1995 (Cth).

If you have any questions concerning this submission, please do not hesitate to contact me.

Yours faithfully,

