



高朋律師事務所
GAOPENG & PARTNERS

7/F, Tower B, Gateway Plaza, 18 Xiaguangli
Chaoyang District, Beijing 100027, China
www.gaopenglaw.com
Tel: (8610) 5924 1188

11 September 2024

The Director
Investigations
GPO Box 2013
Canberra ACT 2601
Australia

By email: investigations@adcommisison.gov.au

Public Version

Dear Sir/Madam,

Re: 650 – Anti-Dumping Commission’s Investigation into the Alleged Dumping and Subsidisation of Steel Corner Beads and Angles Exported from the People’s Republic of China (Anti-Dumping Notice No. 2024/058)

This submission is made on behalf of G Steel Australia Pty Ltd (G Steel).

1. Introduction

G Steel is an Australian importer of steel corner beads and angles from China, classified to the tariff classification listed in the Notice of Initiation. G Steel has indicated its interests as an interested party to the Commission in this investigation.

2. Scope of goods under consideration (the goods) has a significant typo

We wish to point out with respect that we believe there is a typographical error under the description of the goods in the Notice of Initiation, and it shall be corrected.

We note that in the Notice of Initiation, it states “The goods, being the subject of the application (the goods) are:

*Steel corner/finishing beading and angles, metallic coated, whether or not containing alloys, whether or not drilled, punched, perforated or expanded, of all angle types, of a base metal thickness up to and including **40 millimetres** of varying steel grades, with various leg profiles, at various widths and lengths.”*
(emphasis is added by us)

PUBLIC RECORD

Above is identical to the relevant part in the Application. Nevertheless, we believe that 40 millimetres highlighted above is wrong, and it shall be 0.4 millimetres. And the reasons are as the below:

1) The thickness in the proposed MCC is 0.4mm instead of 40mm

The thickness of proposed Model Control Code (MCC) in the Application, as outlined in the response to question A-3.10, is as the below:

Item	Category	Sub-category	Identifier	Sales Data	Cost Data
4	Base Metal Thickness (BMT)	<=0.25mm	1	Mandatory	Mandatory
		>0.25mm - <=0.30mm	2		
		>0.30mm - <=0.35mm	3		
		>0.35mm - <=0.40mm	4		
		>0.40mm - <=0.45mm	5		
		>0.45mm	6		

As you may observe from the above, the Base Metal Thickness (BMT) is 0.45mm in the proposed MCC instead of 45mm, which is 100 times difference.

2) The maximum thickness of the goods of the applicant Rondo is 0.50mm

We note in the response to question A-3.3 of the Application it states that,

“Rondo manufactures equivalent like goods to the imported goods at its facility in Sydney (New South Wales). The like goods fall under Rondo’s Exangle® finishing sections plaster beads range. This range includes, but is not limited to, the following:

- *90° internal corner bead, perforated profile with a 30 mm leg, with a base metal **thickness of 0.30mm**, in lengths of 2,400 mm, 2,700 mm, 3,000mm, and 3,600 mm.*
- *90° external corner bead, perforated profile with a 30 mm leg (boxed), with a base metal **thickness of 0.30mm**, in lengths of 2,400 mm, 2,700 mm, 3,000mm, and 3,600 mm.*
- *135° angle products for internal corners.”*

As you may observe from the above, the thickness illustrated by the applicant is 0.3mm rather than 30mm.

Also, on page 2 in the Non-Confidential Attachment A-3.3.1 of the Application, it states that the goods are “Made from 0.30 – 0.50BMT Galvabond or Zincanneal Steel to provide ideal stiffness”.

SPECIAL FEATURES

- Choice of perforated or Expanded profiles
- Nail holes on selected profiles for easy installation
- Minimum coating of Z200
- Made from 0.30 – 0.50BMT Galvabond or Zincanneal Steel to provide ideal stiffness

Therefore, the thickness of the goods of the applicant ranges from 0.30mm – 0.50mm.

3) Thickness of 40mm is against common sense

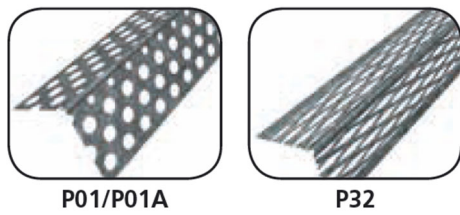
We have talked with the exporters, and believe that 40mm is unreasonable and against common sense. It risks dragging too much irrelevant and innocent exporters whose product are out of the scope of the goods under consideration to join the proceeding, and it also adds unnecessary burdens for the Commission.

As to the goods imported by G Steel, the range of thickness is from [range of thickness], which is significantly larger than 0.4mm due to the different uses and applications. Nevertheless, due to the typo in the description of the goods under consideration in the Notice, it is covered by the range “up to 40mm”.

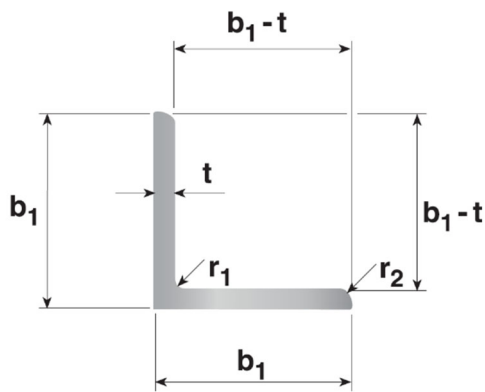
The below is the picture product of our client, G Steel, which is very thick and stable.



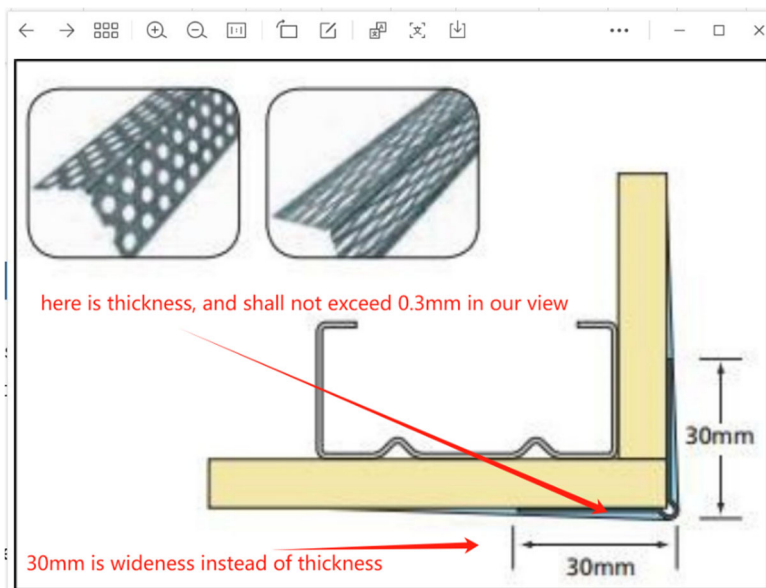
And it is totally different from the goods of the applicant, whose picture is provided as the below, which is very thin (only from 0.3mm to 0.5mm):



Further, the below picture is to show the difference between the thickness (t) and wideness (b1). We guess the error occurred is due to the confusion made by the applicant as to relationship between thickness (t) and wideness (b1).



For reference by the Commission, we also made specific comments by arrows in the picture below provided by the applicant:



4) We guess the typographical error occurred due to the wrong reference to the width

As we note in the proposed MCC of the Application, it states:

PUBLIC RECORD

Item	Category	Sub-category	Identifier	Sales Data	Cost Data
5	Widest leg profile width	<=0.20mm	A	Mandatory	Mandatory
		>20mm - <=25mm	B		
		>25mm - <=30mm	C		
		>30mm - <=35mm	D		
		>35mm - <=40mm	E		
		>40mm	F		

It is evident from the above that the majority of the goods have a widest leg profile width of up to 40mm.

5) Proposed revision of the scope of the goods under consideration by G steel

Therefore, we propose the description of the goods under consideration is revised as the below:

Steel corner/finishing beading and angles, metallic coated, whether or not containing alloys, whether or not drilled, punched, perforated or expanded, of all angle types, of a base metal thickness up to and including 40-0.4 millimetres, and leg profile width up to an including 40 millimeter of varying steel grades, with various leg profiles, at various ~~widths and~~ lengths. (emphasis is added by us)"

3. Request for correction of Notice of Initiation and extension of all deadlines

Since the thickness in the Notice of Initiation shall be 0.4 mm instead of 40mm, we respectfully request the Commission to make the necessary correction and reissue the Notice.

Since all interested parties cannot fill in any questionnaires, including the preliminary information request for sampling of exporters concerned, if there are significant errors in the description and scope of the goods under consideration, we request the Commission to extend all deadlines for responses to the questionnaires including but not limited to the deadline of 11 September for the preliminary information request, 18 and 25 September for the importer questionnaire.

Thank you very much. And please feel free to let us know if you have any instruction.

Sincerely yours,



Liyong Jiang

Counsel for G Steel Australia Pty Ltd