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The Director Investigations
1 GPO Box 2013 Canberra ACT 2601 Australia

Dated November 21, 2024

Dear Director Investigations.

This is suitable for public comments.

This "should" be easy.

A Deformed bar which is bent "gently" in half in order to fit into a 20 foot container should be considered the same as deformed bar in straight lengths

B Deformed bar which is bent to a defined size/angle is the finished product which is then inserted into concrete etc. This requires very different machinery to do the bend and involves making alterations to the product via these bends which could reduce the structural integrity of the bar if not performed correctly. This finished product has a different tariff code and a different ACRS certification scheme to the deformed bar.

A Will be easy for you because Infrabuild will support this conclusion and no one else will seriously argue this point.

B "Should" be easy for you because it is bleeding obvious. However what the circumvention application from Infrabuild proposing that finished mesh is really wire rods tell us is that "bleeding obvious" means nothing any more. If finished mesh can be wire rods then cut and bent bar can be straight bar. Equally a two tonne coil of wire rod can be a pigeon because after all, they are the same colour.

The amount of cut and bent bar actually coming in to the country is miniscule. There is just one cut and bend fabricator of bar which is outside Australia. I know this because we do business with [REDACTED] To my knowledge the market for them has been extremely underwhelming because of the natural market barriers to their business in this cut and bent product. The biggest one in my opinion is the timing. The market here expects drawings to be completed and adjustments to be made and product to be supplied within days of the order/instruction being given. Not weeks and not months. Because of this timing issue the imported market really cannot compete with the many local fabricators and in spite of the fact that the cost to cut and bend would be much cheaper overseas than here, the existing market can be measured in ones..... There is one overseas fabricator and they would have way less than one percent of the cut and bend market in Australia. I think also less than 0.1 percent.

Imported cut and bent product has had significant pricing advantages over local cut and bent product forever..... however so far, that cut and bent imported product would be easily rounded down to zero percent of the current market.

I am not sure if the person asking question B is Infrabuild trying to protect their market or someone else thinking there may be an opportunity. If it is Infrabuild who has been asking these questions then tell them to stop wasting your time. Maybe if you didn't have to deal with these time wasting questions you could expedite the existing case determinations.

If it is someone else then tell themgood luck but various others have tried and failed.

If you care to organise a visit on the issue of mesh and wire rod circumvention case we can easily also explain the significant differences between wire rod and mesh and straight bar and bent bar in detail.

Regards

David

David Roberts

General Manager / Trading Director

SANWA Pty Ltd

