Abey AU

29 July 2025

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

Email: investigations2@adcommisison.gov.au

Public File

Dear Director,

Investigation No. 645 concerning Interchangeable Bolted Clipping System Clip Heads from China

The member of the Australian industry producing like goods (**the goods**) to the goods the subject of this inquiry, Abey Australia Pty Limited (**Abey**), provides this submission in relation to certain representations made by A C Plumbing Supplies (**ACP**) on the recently published *Statement of Essential Facts* (**SEF 645**).

1. ACP continues to ignore price dynamics in its own market

Abey refers to ACP's comments in its SEF 645 response regarding customer purchasing decisions,[1] and is at a loss to understand how ACP can have such a misunderstanding of pricing within its own market. Abey nonetheless seeks to correct the record and provide further evidence in support of how the market actually works.

ACP states that:

> *The SEF continues to treat customers' decisions about the purchase of the goods in isolation from all other products. The SEF seems satisfied to conclude that the price of the goods would, in any case, be a factor in the decision making. We have not suggested it is not a factor, what we have suggested is it is not determinative. One cannot assume a lower price equals more sales.*[2]
>
> ….
>
> *Implicitly the position presented in the SEF is an assumption that demand for the goods under consideration is significantly more sensitive to price than any other item offered by market participants. But such an assumption is not realistic - …*[3]

[1] Folio no. 29, p. 5-6.
[2] Ibid, p. 5.
[3] Ibid, p. 6.

The price of the goods is, in fact, determinative – and its is not, as ACP would have the Commission believe, an all-or-nothing proposition when it comes to a customer's choice of supplier.

No more pointedly can this be convincingly articulated than in an assessment of customer purchasing behaviour following the imposition of provisional measures in March 2025. Following imposition, Abey's regular customer dialogue with [***confidential text deleted:*** *customer name*] developed as follows:

[*Confidential excerpt deleted:* *Confidential Excerpt 1: Abey/[customer] communications concerning the goods*].

[***Confidential text deleted:*** *customer name*] then [***confidential text deleted:*** *customer ordering patterns*] with Abey for the goods, with [***confidential text deleted:*** *quantum of orders vis-à-vis other product lines*]. For the March 2025 – July 2025 period, [***confidential text deleted:*** *customer name*] purchases of the goods [***confidential text deleted:*** *change in order pattern*]:

[*Confidential excerpt deleted: Confidential Excerpt 2* *: [customer] sales*].[4]

Relative to other products, this same [***confidential text deleted:*** *sales trend*] can be shown as follows:

[*Confidential text deleted: Confidential Excerpt 3* *: [customer] sales*].[5]

Abey respectfully submits, contrary to ACP's repeated claims, that the demand for the goods is materially influenced by price. The evidence before the Commission substantiates this conclusion and reflects the commercial realities of the market. Abey welcomes the Commission's recognition of this dynamic in the SEF and respectfully requests that ACP's contrary submissions be given no weight.

Abey remains at the disposal of the Commission for the remainder of INV 645.

FOR AND ON BEHLAF OF

Abey Australia Pty Limited

THE AUSTRALIAN INDUSTRY APPLICANT

[4] Source: Abey's ERP and reporting systems.
[5] Ibid.

Abey Australia PTY LTD
ABN. 34 004 589 879

BNE | MEL | PER | SYD

57-81 Abey Road,
Cobblebank VIC 3338

P. + 61 3 9747 7777
E. mail@abey.com.au