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**Director, Investigations 3
Anti-Dumping Commission**

BY EMAIL: investigations3@adcommission.gov.au

Dear Director,

Continuation Inquiry 689 – Precision Pipe & Tube (PP&T) from China and Korea

Austeel Trading Pty Ltd (**Austeel Trading**) makes the following comments and observations to the Anti-Dumping Commission (**ADC**) in relation to Continuation Inquiry 689 concerning Precision Pipe and Tube (**PP&T**) from China and Korea (**CON 689**). We consider our submission relevant to the Commission's assessment of material injury and causal link.

Market contraction in PP&T – losses incurred by Orrcon are not attributable to dumping

The Australian PP&T market has contracted significantly over recent years due to the loss or downsizing of major downstream industries e.g. car manufacturing. The decline is structural and unrelated to the pricing behaviour of importers.

Austeel Trading submits that the sales reductions reported by Orrcon are a function of shrinking market demand. Irrespective of the continuation of the measures, Orrcon will continue to suffer a deterioration in its market and financial condition caused by a contracting Australian PP&T market, not a recurrence of imports, or dumped imports.

Conclusion

Austeel Trading respectfully submits that the Australian PP&T market has structurally contracted, and Orrcon's sales declines arise from reduced demand and changing customer behaviour - not from dumped imports.

We remain available to provide further details or clarification as required.

To discuss any aspect of this submission, please do not hesitate to contact your Austeel Trading contact on record.

FOR AND ON BEHALF OF

An Australian importer
AUSTEEL TRADING PTY LTD