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1 April 2026

Director
Investigations 2
Anti-Dumping Commission
PO Box 2013
CANBERRA ACT 2601

BY EMAIL: investigations2@adcommission.gov.au

Dear Director,

Anti-Circumvention Inquiry No. 685 concerning the slight modification of Hollow Structural Sections exported from the People's Republic of China, the Republic of Korea, Malaysia and Taiwan

AUSTRALIAN INDUSTRY MEMBER'S RESPONSE TO
STATEMENT OF ESSENTIAL FACTS NO. 685

Austube Mills Pty Ltd (ATM), a member of the Australian industry producing like goods to the goods the subject of measures; and original applicant for the anti-dumping measures; refers to the Statement of Essential Facts (SEF) of the Commissioner of the Anti-dumping Commission (respectively, **the Commissioner** and **the commission**) published on 23 March 2023 in this inquiry (SEF 685).¹

At the outset, ATM welcomes the Commissioner's recommendation that the Minister alter the original dumping duty notice to include the circumvention goods, namely HSS (as defined) *'that has been drilled at the end or along the length of the section'*, and that alteration take effect from the date of publication of the notice initiating this inquiry on 4 September 2025.

Although ATM regrets that the commission confined its inquiries to those circumvention goods slightly modified by the drilling of holes as alleged in the application and identified in the notice initiating this inquiry; despite the evidence led by ATM in its submissions lodged on the 2nd and

¹ EPR 685/009.

16th of December 2025;² ATM also acknowledges the importance of concluding anti-circumvention inquiries in a timely and expedient manner.

In terms of the form of the recommended alteration to the **original dumping duty notice**,³ ATM submits that the recommendation to the Minister be made to amend the description of the goods from:

*'certain hollow structural sections (the goods) classified to tariff subheadings 7306.30.00 (statistical codes 31, 32, 33, 34, 35, 36 and 37), 7306.61.00 (statistical codes 21, 22 and 25) and 7306.69.00 (statistical code 10) in Schedule 3 of the Customs Tariff Act 1995'*⁴

to:

'Certain electric resistance welded pipe and tube made of carbon, or other alloy steel, comprising circular and non-circular hollow sections. Normally referred to as either CHS (circular or oval hollow sections) or RHS (rectangular or square hollow sections) collectively referred to as hollow structural sections (HSS), including CHS with other than plain ends, such as threaded, swaged and shouldered, and any HSS that has been drilled at the end or along the length of the section.'

In recommending this alteration, the Commissioner will be proposing a description of the goods that:

- reflects nomenclature commonly used and understood by the Australian market to identify the goods and like goods the subject of the original dumping duty notice;
- addresses the circumvention activity as identified during this inquiry and any other goods similarly slightly modified by the addition of drilled holes; and
- includes the outcome of the previous *Anti-circumvention Inquiry No. 291* concerning the original dumping duty notice.⁵

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

FOR AND ON BEHALF OF

The Australian industry member
Austube Mills Pty Ltd

² EPR 685/004 and 005, respectively.

³ Under section 269ZDBC 'an original notice' means a notice published under subsection 269TG(2) or 269TJ(2) in respect of goods.

⁴ Refer EPR 177/416 for an extract of the notice under section 268TG(1) and (2) of the *Customs Act 1901*.

⁵ ADN 2016/24 refers.