

9 April 2026

Director  
Anti-Dumping Commission – Investigations 3  
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Melbourne Victoria 3001

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## Public File

Dear Director,

### Continuation 689 – Precision Pipe & Tube (PPT) exported from China and Korea

#### Australian Industry Response to Austeel Trading Pty Ltd representations

Orrcon Manufacturing Pty Ltd (**Orrcon**), as the sole member of the Australian industry producing like goods to the goods the subject of the measures, and as the original applicant for the anti-dumping measures, refers to the public submission by *Austeel Trading Pty Ltd (Austeel)* regarding the contraction in demand for PPT in Australia, published on 30 March 2026.<sup>1</sup>

This submission responds to Austeel's representations to ensure the Commission has a complete and accurate basis to assess material injury and the causal link, including whether material injury would continue or recur if the measures were allowed to expire.

Austeel submits that:

#### ***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.*

First, Orrcon agrees that overall demand in Australia for PPT declined over the period addressed in Orrcon's continuation application. Orrcon notes, however, that its continuation application also identified that exports of the goods to Australia from China and Korea maintained a high and stable proportion of total PPT exports, even as Australian demand for PPT declined. Orrcon submitted that this indicated strong distribution links and a preference for PPT from China and Korea over domestic supply and supply from non-subject countries.

As set out in Orrcon's continuation application, Orrcon presented the composition of total Australian demand for PPT for FY2022 to FY2025 on an annual basis as follows:

**[Confidential chart deleted: Confidential Chart 1: PPT market composition, FY2022 – FY2025<sup>2</sup>]**

<sup>1</sup> EPR folio no. 9.

<sup>2</sup> Confidential Appendix A2.

Orrcon also presented total Australian demand on a quarterly basis over the full injury analysis period as follows:

**[Confidential chart deleted: Confidential Chart 2: PPT market composition, FY2022 – FY2025<sup>3</sup>]**

The continuation application Appendix A2 data presented by Orrcon depicted a contraction in total Australian volume demand from an estimated [XX] metric tonnes in FY2022 to [XX] metric tonnes in FY2025. Orrcon presented total Australian demand as comprising:

- Orrcon sales volumes, declining from [XX] metric tonnes in FY2022 to [XX] metric tonnes in FY2025;
- imports from China and Korea, increasing from [XX] metric tonnes in FY2022 to [XX] metric tonnes in FY2025; and
- imports from non-subject countries, increasing from [XX] metric tonnes in FY2022 to [XX] metric tonnes in FY2025.

Second, on the basis of these quantified trends, Orrcon respectfully disagrees with Austeel's assertion that contracting demand alone explains the injury experienced by the Australian industry. Austeel's submission advances a single explanatory factor, namely demand contraction, without assessing the prevalence of subject country imports or the price effects associated with those imports. Austeel has not provided an evidence-based analysis of demand in Australia for PPT that examines the interaction between domestic supply, subject country imports and imports from non-subject countries, nor has it quantified the impact of imported PPT on the Australian industry.

In a continuation inquiry, the assessment of material injury and the causal link requires consideration of all relevant factors, including the role and effects of subject country imports in a declining demand environment. Orrcon recognises that the applicant's role is to articulate the causal link, supported by evidence, and that the Commission then tests and verifies that evidence.

Orrcon supported its continuation application at verification with evidence supporting the proposition that the expiration of the measures would lead to a continuation or recurrence of material injury. The Commission's observations on the economic condition of the Australian industry, while necessarily preliminary at this stage of the inquiry, are recorded in the Commission's verification file note<sup>4</sup> following its verification of the information and data submitted by Orrcon in support of its continuation application. The verification file note records a decline in the economic condition of the Australian industry over the injury analysis period, including volume, price, profit, profitability and other factors.<sup>5</sup>

The Commission's verification file note also records that the Commission verified the data submitted by Orrcon as complete, relevant and accurate for use in Continuation Inquiry 689. The file note further records the Commission's findings that Orrcon's sales and coil purchases were arm's length in the inquiry period. These findings confirm the reliability of the evidence relied upon by Orrcon in support of its continuation application.

Against this evidentiary background, Orrcon submits that the verification file note provides important context for the causal effect determination to be set out in the forthcoming Statement of Essential Facts and Final Report. Orrcon submits that the measures should continue and that, without the measures, material injury would continue or recur.

In particular, in relation to sales share, Orrcon submits that subject country imports caused the loss of share. Orrcon submits that subject country imports gained share in a declining demand environment by offering prices that materially undercut domestic prices, consistent with the unfair pricing behaviour addressed by the existing measures. Orrcon submits that this diverted sales that, in the absence of dumped imports, would have been made by the Australian producer.

For and on behalf of Orrcon.

<sup>3</sup> Ibid.

<sup>4</sup> EPR folio no. 7.

<sup>5</sup> Ibid, p. 2-3.