



## Submission to the Anti-Dumping Commission

### Case 658 – Hot Rolled Steel Coil from China

### Response to the Statement of Essential Facts (SEF)

Submitted by: Duraquip, 3 Hensbrook Loop Forrestdale WA 6112

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## 1. Executive Summary

Duraquip appreciates the opportunity to comment on the Statement of Essential Facts (SEF) for Case 658.

Please note that statements made herein are made in “good faith” and “to the best of our knowledge” in the absence of suitable time before closing date for submissions.

We request that the Commission **exclude long-length decoiled plate in 3 mm and 4 mm thickness at 1800 mm width and approximately 11,990 mm length** from the scope of the investigation.

To the absolute best of our knowledge, this particular size product is **not manufactured by any Australian steel mill**, has **no domestic substitute**, and is **only available via importing decoiled sheets or locally decoiling imported coil**. All Australian distributors — including those supporting the application — rely on imported product to supply this particular product.

Duraquip imported this product **only because our regular domestic supplier, [Supplier A], was unable to supply in time**, and we had no alternative domestic source. This was a one-off necessity, not a commercial strategy.

We respectfully submit that the SEF does not adequately consider the **complete absence of domestic production capability** for this specific product, and that inclusion of this product in the investigation would create **unintended harm to downstream Australian manufacturers** without providing any benefit to Australian steel producers.

## 2. Duraquip’s Interest in the Investigation

Duraquip is a Western Australian manufacturer requiring **long-length steel plate** for the production of Transport Equipment.



We have historically sourced this product domestically. However, the specific product we require — **3 mm and 4 mm × 1800 mm × 11,990 mm decoiled plate** — has **never been produced in recent times by Australian mills** in the required dimensions.

Please note it is not a suitable alternative to use smaller plate sizes and join, as this is too inefficient and structurally and aesthetically unacceptable for our products.

Our importation occurred solely due to a supply failure by **[Supplier A]**, who themselves rely on imported source for this product.

**We are not a regular importer of plate**, and we have no commercial incentive to import unless domestic supply fails.

### **3. Background: Domestic Supply Chain for Long-Length Plate**

For at least the past decade, the Australian steel industry has been unable to supply Australian made long-length plate in the dimensions required by Duraquip. Key facts include:

#### **3.1 No Australian mill produces 12-metre plate in 3–4 mm thickness at 1800 mm width**

- Australian hot-roll mills do not produce plate in these dimensions.
- Mills may produce long plate in other widths/thicknesses, but **not in this combination**.

#### **3.2 All long-length 1800mm wide plate in Australia originates from imported coil or imported decoiled product.**

Historically:

- **[Supplier B]** operated a decoiler in WA, processing coil into long plate.
- This facility was closed, removing the only local mill-linked decoiling option.
- Since then, suppliers have relied on **[Supplier C]** in NSW and a small number of other decoilers — all using **imported feedstock**.

#### **3.3 Domestic distributors cannot supply this product from Australian mills**

Suppliers such as:

- **[Supplier A]**
- **[Supplier D]**
- **[Supplier E]**



- [Supplier F]
- [Supplier G]

all rely on imported coil for long-length plate.

### 3.4 Industry knowledge confirms no domestic production

Duraquip can provide statements from reputable industry participants confirming:

- No Australian mill produces 3 mm or 4 mm × 1800 mm × 12 m plate.
- All supply is imported.
- Domestic decoiling capacity is limited and subject to long lead times and logistical challenges.

### 4. Product Characteristics That Distinguish It From the Goods Under Consideration

The product Duraquip requires is:

- **Thickness:** 3 mm and 4 mm
- **Width:** 1800 mm
- **Length:** 11,990 mm
- **Form:** Decoiled sheet from imported coil
- **End use:** Semi-Trailers

### 5. Evidence of Domestic Supply Failure

Duraquip's recent importation occurred only because **[Supplier A]** was unable to supply the required product within the necessary timeframe.

We can provide:

- **Purchase orders** showing delayed supply
- **Correspondence** confirming lack of stock
- **Lead time estimates** from domestic suppliers
- **Historical purchasing records** showing reliance on domestic distributors until supply failure
- **Evidence that [Supplier A] themselves import this product.**



This demonstrates that:

- Duraquip did not import to undercut domestic suppliers
- Domestic supply is unreliable and capacity-constrained
- Domestic mills do not produce the product at all

## 6. Request for Product Exclusion

Duraquip formally requests that the Commission **exclude the following product** from the scope of Case 658:

**Decoiled steel plate in 3 mm and 4 mm thickness, 1800 mm width, and lengths of approximately 11,990 mm, produced from coil.**

**Reasons for exclusion:**

1. **No Australian mill manufactures this product.**
2. **All domestic supply is imported**, including from supporters of the application.
3. **The product is technically distinct** from hot-rolled plate.
4. **Supply chain capacity is limited**, with only a small number of decoilers nationwide.
5. **Inclusion would harm downstream Australian manufacturers** without protecting any domestic producer.
6. **Duraquip's importation was a necessity**, not a commercial strategy.

We also suggest that the Commission consider limiting the scope of the investigation to very specific thickness and widths and then consider the available plate lengths (for those specific thicknesses) **up to the maximum length currently produced by Australian mills**, as this would then fairly align the investigation with actual domestic production capability, rather than the current blanket approach.

## 7. Confidentiality

Duraquip submits a confidential version and a non-confidential version of this submission. Confidential information is clearly marked and relates to:

- commercial supply arrangements



- supplier performance
- internal production requirements

## 8. Conclusion

Duraquip supports fair and competitive trade but submits that the inclusion of long-length 1800mm wide decoiled plate in the scope of Case 658 is inappropriate and unsupported by domestic production capability.

We respectfully request that the Commission:

- **Exclude 3 mm and 4 mm × 1800 mm × 11,990 mm decoiled plate** from the investigation, and
- Limit the scope of the investigation to only plate sizes and thicknesses that Australian mills can actually produce currently.

We would welcome the opportunity to provide further evidence, including industry statements, supply chain documentation, and historical purchasing records.

## Attachments

- Attachment A: Confidential version of submission.
- Attachment B: Public version of submission