FOR PUBLIC RECORD

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The Director
Investigations 3
Anti-Dumping Commission

BY EMAIL: investigations3@adcommission.gov.au

Dear Director,

Continuation Inquiry No. 710 concerning certain hollow structural sections from China, Korea, Malaysia and Taiwan

Proposal to modify proposed Model Control Code Structure

Austube Mills Pty Ltd (**Austube Mills**), an Australian industry applicant in this matter, notes that the Model Control Code (**MCC**) Structure contained in the Anti-dumping Notice[1] advising initiation of Continuation Inquiry No. 710 (**CON 710**) is different to the MCC structure proposed by Austube Mills in its application for continuation[2].

Austube Mills submits that its proposed MCC structure be adopted (along with the additional category of 'Holes') by all parties completing a response to questionnaire, whether representing industry, an exporter or an importer as this MCC structure more clearly distinguishes the finish or coating types present in the Australian Hollow Structural Sections (**HSS**) market and removes a sub-category of grade that is not relevant to the goods.

An overview of the differences between the MCC structure contained in the initiation notice published by the Anti-dumping Commission (**Commission**) and the MCC structure proposed by Austube Mills for use by all cooperating parties to the inquiry is provided in the schematic containing the MCC table comparison below with the relevant changes summarised as follows:

- '*Galvanising*' and '*Finish*' categories are consolidated into a 'Coating' category with three main subcategories, namely 'G-Galvanised (with or without top coat)', 'P-Painted' and 'N-None (includes oiled)'.
    - Austube Mills considers that the consolidated coating category provides a commercially relevant basis for improving model matching reflecting the significant pricing distinction between galvanised and non-galvanised products, with painted products forming a distinct commercial segment. Consolidation also reduces unnecessary model complexity with the potential to distort commercially relevant model comparison.
- The category '*Steel grades – nominal minimum yield strength*' wording has been changed to reflect that the characteristic of '*nominal minimum yield strength*' refers to the mechanical property specifications contained in the relevant Standard to which the products have been manufactured and certified to. A comparison of the relevant Standards in Australia and the country of export will allow the Commission to verify the accuracy and consistency of the model classification applied to 'Steel grades' categories by all exporters.

[1] Anti-dumping Notice No. 2026/093 at Table 3 (MCC structure)
[2] Austube Mills - Final Annexure A at page 5

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- The sub-category '*Steel grade with no nominal yield strength*' has been removed as all hollow structural sections, being the goods the subject of this inquiry, are manufactured to meet or exceed the minimum values of mechanical properties defined by Standards they are produced to. Accordingly, Austube Mills considers that it is not relevant to include a sub-category of HSS with no (minimum) nominal yield strength and it should be removed.
- The additional category for 'Holes' has been added to the MCC structure proposed by Austube Mills.

MCCs per ADN 2026/093

Item	Category	Sub-category	Identifier
1	Prime	Prime	P
		Non-Prime / downgrade	N
2	Galvanising	Galvanised	G
		None (eg. mill finish, 'black')	P
3	Finish	Oiled	O
		Painted	P
		Coating other than oil or paint	R
		No coating	N
4	Shape	Circular	C
		Rectangular or square	R
		Oval	O
		Other	N
5	Steel grades - nominal minimum yield strength	Steel grade with nominal minimum yield strength less than or equal to 300 MPa	250
		Steel grade with nominal minimum yield strength greater than 300 MPa but less than 380 MPa	350
		Steel grade with nominal minimum yield strength equal to or greater than 380 MPa	450
		Steel grade with no nominal yield strength	N
6	Ends	Plain	P
		Threaded (at one or both ends)	T
		Threaded and coupled	C
7	Holes	Holes (including drilled, punched, pierced, cut or otherwise) at the end of the section, along its length or both	H
		No holes	N

MCCs per Austube Mills Application (with 'Holes' category added)

Item	Category	Sub-category	Identifier
1	Prime	Prime	P
		Non-Prime / downgrade	N
2	Coating	Galvanised (with or without top coat)	G
		Painted	P
		None (includes oiled)	N
3	Shape	Circular	C
		Rectangular or square	R
		Oval	O
		Other	N
4	Steel grades - nominal minimum yield strength specified by product standard	Steel grade with nominal minimum yield strength less than or equal to 300 MPa	250
		Steel grade with nominal minimum yield strength greater than 300 MPa but less than 380 MPa	350
		Steel grade with nominal minimum yield strength equal to or greater than 380 MPa	450
5	Ends	Plain	P
		Threaded (at one or both ends)	T
		Threaded and coupled	C
6	Holes	Holes (including drilled, punched, pierced, cut or otherwise) at the end of the section, along its length or both	H
		No holes	N

Conclusion

Austube Mills submits that its proposed amended MCC structure better differentiates the commercially significant properties relevant to HSS produced and sold in the Australian market and will form the basis of Austube Mills' industry response to questionnaire.

Austube Mills further requests that the amended MCC structure be mandated for completion of all other questionnaire responses.

For and on behalf of Austube Mills Pty Ltd