



G.P. Marketing International Pty. Ltd.

ABN: 22 363 015 232

Level 6, 21 Berry St, North Sydney NSW 2060

P.O. Box 1559, North Sydney NSW 2059

Ph: +61-2-9925-0755 | Fax: +61-2-9925-0909 | Email: gpmi@gpmi.com.au

PUBLIC RECORD

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The Director, Investigations 3

Anti-Dumping Commission

GPO Box 2013

Canberra ACT 2601

By email: investigations3@adcommission.gov.au

Re: Continuation Investigation No. 710 – Certain Hollow Structural Sections; Hot Dipped Galvanised Pipe (HS Code 7306.30.00 - statistical codes 31, 32, 33, 34, 35, 36 and 37)

Dear Director,

We write regarding Continuation Investigation No. 710 into certain hollow structural sections (HSS) exported from the People's Republic of China, the Republic of Korea, Malaysia and Taiwan, and in particular the hot dipped galvanised (HDG) finish of pipe within that product scope, classified under HS code 7306.30.00 (statistical codes 31, 32, 33, 34, 35, 36 and 37). As an importer directly affected by this investigation, we wish to raise several concerns about the basis on which it has proceeded, and we would appreciate the Commission's clarification on the points set out below.

1. Absence of a viable domestic industry for this specific product

The overwhelming majority, if not the entirety, of hot dipped galvanised pipe sold in the Australian market is sourced from overseas. Domestic manufacture of this specific finish type is not undertaken at commercial scale because it is not economically viable to do so locally. We ask the Commission to confirm what evidence of an established domestic industry actually producing hot dipped galvanised pipe (as opposed to other HSS finish types) has been relied upon in initiating and continuing this investigation.

2. The applicants' own participation in importing the product

We understand that Austube Mills Pty Ltd and Orrcon Manufacturing Pty Ltd, the two applicants for continuation of the measures, themselves (directly or through traders) import hot dipped galvanised pipe to service their own customers. A domestic industry that relies on importing the very product said to be causing it injury sits uneasily with the premise of the investigation, and we ask the Commission to have regard to the volume and pattern of these manufacturers' own import activity in assessing injury and causation.

3. Request to review local manufacturers' production records

We would encourage the Commission to review Austube Mills' and Orrcon's own production records specifically as they relate to hot dipped galvanised pipe, rather than HSS production generally. This would allow the Commission to verify the actual scale, if any, of domestic manufacture of this

particular product and to test the applicants' claims against their real production and import activity for this finish type.

4. Pregalvanised CHS is not a like good

We anticipate that the applicants may point to their pregalvanised CHS product as the domestically produced "like good" to hot dipped galvanised pipe. We do not consider this to be correct. The zinc coating applied to hot dipped galvanised pipe is materially heavier than that applied to pregalvanised CHS, which utilises coil which has been pre-zinc coated rather than by full immersion after fabrication. This difference in coating weight and process directly affects corrosion protection, service life, and the applications each product is fit for, and in our view is sufficient to distinguish the two products rather than treat them as substitutable "like goods."

5. The inconsistency this raises

If pregalvanised CHS and hot dipped galvanised pipe were genuinely like goods, it is unclear why Austube Mills and Orrcon would need to import hot dipped galvanised pipe at all, rather than meeting that demand from their own production. Their continued importation of the product suggests that they themselves do not regard the two products as interchangeable, which we submit is directly relevant to the like goods assessment in this investigation.

In light of the above, we would be grateful if the Commission could clarify the evidentiary basis for the domestic industry and like goods findings underpinning Continuation Investigation No. 710, and confirm how the matters raised above have been or will be taken into account. We would welcome the opportunity to discuss this further and to provide supporting information if that would assist the Commission's consideration.

Yours faithfully,

GP Marketing International Pty Ltd