

9 September 2026

Director
Anti-Dumping Commission – Investigations 3
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Public File

Hollow structural sections from China, Korea, Malaysia and Taiwan – Continuation No. 710 Submission in relation to proposed Model Control Code structure

Dear Director

Orrcon Manufacturing Pty Ltd (**Orrcon**) refers to the Model Control Code (**MCC**) structure proposed by the Commission in Anti-Dumping Notice No. 2026/093 in relation to Continuation No. 710 (**CON 710**).

The Commission invited interested parties to make submissions on whether any proposed modifications to the MCC structure should be accepted by the Commission.

Orrcon has reviewed the proposed MCC structure and considers that it generally provides an appropriate and commercially relevant basis for model matching in this inquiry. Orrcon also supports the changes incorporated by the Commission compared to MCC structures used in previous inquiries concerning hollow structural sections, as the proposed structure appropriately captures relevant product characteristics, presents mutually exclusive categories and should facilitate consistent model matching across cooperating parties.

Notwithstanding its general support for the Commission's proposed MCC structure, Orrcon suggests the following minor amendments to certain sub-category descriptions in order to improve clarity and ensure completeness:

- Under the Galvanising category, the sub-category currently described as "Galvanised" should be amended to "Galvanised (including all zinc-based alloy coatings)". This amendment would clarify that the category encompasses products coated with any zinc-based alloy coating type, including zinc-aluminium and zinc-magnesium coatings; and
- Under the Ends category, the sub-category currently described as "Threaded (at one or both ends)" should be amended to "Threaded (at one or both ends), swaged, or shouldered". This amendment would better align the MCC structure with the goods description and ensure that common end treatments present in the Australian market are appropriately captured.

Subject to the amendments outlined above, Orrcon supports the MCC structure proposed by the Commission, including the separate category for holes.

Orrcon considers that all cooperating parties should use a consistent MCC structure when completing questionnaire responses. A common structure will assist the Commission to obtain comparable data from the Australian industry, exporters and importers and reduce the risk of inappropriate model matching arising from differences in product coding.

For those reasons, Orrcon submits that the Commission should adopt the MCC structure proposed in Anti-Dumping Notice No. 2026/093, subject to the minor amendments outlined above.

For and on behalf of Orrcon Manufacturing Pty Ltd