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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 Inquiry No. 710 – Hollow Structural Sections* - Response to Austube Mills Pty Ltd Submission Regarding Hot-Dipped Galvanised HSS

1. Introduction

GP Marketing International Pty Ltd (GP Marketing) refers to the submission made by Austube Mills Pty Ltd (ATM) dated 14 September 2026 in response to GP Marketing's submission concerning hot-dipped galvanised hollow structural sections (HDG HSS).

GP Marketing maintains that there are important factual and evidentiary matters concerning HDG HSS which warrant further examination by the Commission before reaching any conclusion regarding the continuation of measures in respect of that product.

In particular, GP Marketing does not accept ATM's assertion that there is no new evidence or material change warranting further consideration. GP Marketing is able to provide the Commission with transaction-level evidence concerning actual purchases of HDG HSS by ATM or entities related to ATM.

GP Marketing is prepared to provide that evidence separately and confidentially to the Commission upon request, including relevant product/item numbers and supporting transaction documentation.

GP Marketing's position is not that the Commission should simply accept GP Marketing's evidence. Rather, GP Marketing respectfully requests that the Commission use the information provided by GP Marketing to independently test the applicants' assertions against their own purchasing, production and sales records and, where appropriate, other available import and trader information.

2. The issue should be examined by reference to actual market evidence

ATM submits that GP Marketing has not established an evidentiary basis for treating HDG HSS differently from other galvanised HSS. ATM places particular emphasis on the proposition that coating mass is a product feature rather than a fundamental difference in the goods, and that there is insufficient objective evidence of different end uses or lack of interchangeability.

GP Marketing considers that this approach gives insufficient weight to actual purchasing behaviour in the Australian market.

The question is not simply whether two steel products can theoretically perform a similar function. The Commission is also able to examine whether the products are actually purchased, supplied and used as substitutes in the market, and whether the Australian producers themselves treat the products as interchangeable when sourcing material for their customers.

This is particularly relevant because ATM or entities related to ATM have themselves purchased HDG HSS from GP Marketing.

These transactions provide objective market evidence that is capable of being independently verified.

GP Marketing therefore respectfully submits that the Commission should examine these transactions when assessing the relationship between imported HDG HSS and the goods produced by the Australian industry.

3. GP Marketing's evidence can be independently verified

GP Marketing anticipates that the applicants may seek to characterise its evidence as merely a commercial assertion or customer preference.

That would not accurately describe the evidence that GP Marketing is prepared to provide.

GP Marketing can provide the Commission with evidence identifying, among other things:

- relevant HDG HSS item numbers;
- product descriptions;
- dimensions;
- galvanising/coating specifications, where available;
- transaction dates;
- quantities;
- the purchasing entity; and
- supporting purchase orders, invoices and other commercial documentation.

GP Marketing will provide this information separately and confidentially upon request, rather than placing commercially sensitive customer and transaction information on the public record.

The Commission can then determine what weight should be given to the evidence and, where appropriate, verify it independently.

The Commission's information policy recognises that information may be obtained from Australian industry, importers, exporters, suppliers and other parties, and that relevant import information can be obtained through the Australian Border Force Integrated Cargo System. The policy also contemplates verification and requests for additional information where required.

Accordingly, GP Marketing respectfully submits that the existence of independently verifiable transaction evidence should not be dismissed merely because the detailed commercial documents are not included in the public submission.

4. Import records alone may not identify the ultimate purchaser

GP Marketing also recognises that it may not be possible for the Commission to identify all purchases of HDG HSS by ATM or their related entities simply by searching import records under the names of those entities.

In the Australian market, purchases may be made through traders or other intermediaries. Such arrangements can provide customers with financing, logistics, insurance and other commercial services. Consequently, the entity appearing as the importer of record may not necessarily be the ultimate purchaser or user of the HDG HSS.

GP Marketing therefore considers that an import-data search limited to the names of ATM or related entities may not provide a complete picture of their acquisition of imported HDG HSS.

This does not make the transactions incapable of verification. Rather, it indicates that a broader examination of the available evidence may be appropriate.

GP Marketing respectfully requests that, to the extent considered appropriate and available, the Commission consider:

- GP Marketing's transaction evidence concerning sales of HDG HSS to ATM or entities related to ATM;
- the applicants' purchasing, accounts-payable, inventory and sales records;
- purchases of HDG HSS made through traders or other intermediaries;
- relevant records held by traders where those records identify the ultimate purchaser;
- relevant import data available to the Commission; and
- the product/item numbers and specifications identified by GP Marketing when undertaking any such verification.

The purpose of this exercise would not be to assume that every imported HDG HSS product is necessarily the same as every galvanised HSS product produced domestically. It would be to establish what products the applicants actually purchased, in what quantities, from whom, and for what commercial purpose.

5. The applicants' own purchasing behaviour is relevant to interchangeability

GP Marketing considers that this evidence is particularly relevant to ATM's argument concerning interchangeability.

ATM submits that there is insufficient objective evidence demonstrating materially different end uses or a lack of interchangeability.

However, where an Australian producer or a related entity purchases HDG HSS from an importer, the transaction itself provides evidence of actual market demand for that product.

The Commission can therefore ask a straightforward factual question:

“If the HDG HSS purchased by the applicants is commercially interchangeable with the galvanised HSS produced domestically, why did the applicants or their related entities purchase the relevant HDG HSS from an importer or trader rather than satisfy that demand through their own domestic production?”

GP Marketing does not suggest that the answer to this question should be assumed.

There may be legitimate commercial reasons for such purchases, including product availability, specifications, customer requirements, delivery requirements or other factors.

However, those reasons are precisely what should be examined when assessing whether the imported HDG HSS and the domestically produced goods are genuinely commercially interchangeable.

The applicants' actual purchasing behaviour is therefore relevant evidence which should be considered alongside the other evidence in the inquiry.

6. The distinction between HDG HSS and pre-galvanised HSS warrants product-specific consideration

GP Marketing's original submission explained that HDG HSS and pre-galvanised HSS are not necessarily equivalent products merely because both contain a zinc-based corrosion-resistant coating.

In particular, HDG HSS is galvanised after fabrication, whereas pre-galvanised HSS is generally manufactured from zinc-coated steel coil before the hollow section is formed.

The galvanising process and resulting coating characteristics can therefore be materially different.

GP Marketing's submission raised the issue of the substantially different coating characteristics of HDG HSS, including the significance of coating mass and resulting corrosion protection.

GP Marketing accepts that the existence of a different coating specification does not, by itself, determine whether goods are 'like goods'. Section 269T(1) of the Customs Act 1901 provides that goods are like goods where they are identical in all respects or, if not identical, have characteristics closely resembling the goods under consideration.

The point is therefore not that every HDG product must automatically be treated as different goods.

Rather, GP Marketing submits that the Commission should examine the specific HDG products actually traded in the Australian market, including their specifications, coating characteristics, applications, customers and purchasing patterns.

7. Coating mass is directly relevant to durability and performance

GP Marketing also considers that ATM's characterisation of coating mass as merely a product feature understates its technical significance.

The Galvanizers Association of Australia (GAA) states that the durability or service life of galvanised coatings is generally directly proportional to coating thickness. The GAA further explains that the service life of a post-fabrication galvanised item is directly proportional to the thickness of the coating, and distinguishes this from continuous galvanising processes in which coating thickness is deliberately controlled for subsequent forming.¹

This is relevant to the present inquiry because the issue is not simply whether both products contain zinc or can perform a broadly similar structural function. The quantity and thickness of the zinc coating can materially affect corrosion protection and the service life of the finished product. The GAA's published technical material provides examples of materially different coating masses and thicknesses for continuously coated hollow sections compared with post-fabrication hot-dip galvanised products to AS/NZS 4680.¹

¹ Galvanizers Association of Australia (GAA). The GAA states that coating durability/service life is generally directly proportional to coating thickness and provides comparative coating thickness information for different galvanising systems. Sources: [Protective life of galvanized coating](#); [Performance in Various Environments](#); [GAA FAQ – durability/performance](#)

Accordingly, where the imported HDG HSS has a materially different coating specification from pre-galvanised HSS, the difference should not be treated as merely an incidental product characteristic without examining its effect on durability, performance and customer requirements.

GP Marketing does not submit that coating mass or thickness, considered in isolation, determines whether goods are like goods for the purposes of the Customs Act 1901. Rather, GP Marketing submits that the coating characteristics are a relevant technical consideration which should be assessed together with the galvanising process, product specifications, end uses, customer requirements and, importantly, the actual purchasing behaviour of the Australian producers.

This is precisely why GP Marketing considers that the Commission should examine the specific HDG products purchased by the applicants and related entities, rather than relying solely on a general proposition that galvanised HSS products are capable of performing similar functions.

8. ATM's reliance on earlier findings does not remove the need to consider new evidence

ATM places substantial reliance on the Commission's previous consideration of galvanised HSS, including CON 590 and the earlier consideration of HDG products. ATM submits that GP Marketing has not identified new evidence or a material change sufficient to depart from those findings.

GP Marketing respectfully disagrees with the proposition that the Commission should reach that conclusion before considering the evidence now offered by GP Marketing.

The relevant question is whether the evidence available to the Commission now provides a sufficient basis to examine the issue further.

In particular, GP Marketing is offering to provide transaction-level evidence concerning actual purchases by the applicants and related entities. That evidence was not simply a general assertion that customers 'prefer' HDG HSS. It is evidence of actual commercial transactions involving the parties whose submissions are before the Commission.

GP Marketing therefore respectfully requests that the Commission consider this evidence before determining whether there is any evidentiary basis for further distinguishing HDG HSS from other galvanised HSS.

9. The earlier EX0093 consideration should also be distinguished from the evidence now available

GP Marketing acknowledges ATM's reliance on the Commission's earlier consideration of HDG products, including EX0093.

ATM notes that EX0093 considered HSS incorporating air-blown hot-dip galvanising and zinc coating of approximately 200–300 g/m² and that an exemption was not recommended because the evidence available at that time was insufficient to establish the relevant statutory basis for exemption.

GP Marketing does not suggest that those earlier findings should simply be disregarded.

However, an earlier conclusion that the evidence then available was insufficient does not necessarily answer the question where additional, independently verifiable transaction evidence is now available.

GP Marketing's request is therefore limited and practical: the Commission should consider the new evidence offered by GP Marketing and determine what weight it should receive after appropriate verification.

10. Requested verification of domestic production

GP Marketing also respectfully requests that the Commission examine whether the relevant HDG products identified by GP Marketing are actually manufactured domestically in commercially meaningful quantities.

GP Marketing is prepared to provide the Commission with specific HDG HSS item numbers that can assist this exercise.

The Commission could, where appropriate, compare those item numbers and specifications against the applicants' production records to determine:

- whether the relevant HDG products are manufactured domestically;
- in what quantities;
- during what periods;
- to what specifications;
- whether the products are produced as standard stock or only on particular customer requirements; and
- whether the relevant products are commercially available from domestic production in the quantities and specifications demanded by customers.

This would provide a more direct evidentiary basis for assessing the relationship between the imported HDG HSS and the Australian-produced goods than a general proposition that galvanised HSS products are capable of performing similar functions.

11. Confidentiality of transaction evidence

GP Marketing's transaction evidence contains commercially sensitive information concerning customers, quantities, transactions and commercial relationships.

GP Marketing therefore proposes to provide the detailed evidence separately and confidentially to the Commission upon request.

GP Marketing understands that information provided to the Commission is subject to the applicable statutory and administrative requirements concerning confidentiality and public versions. GP Marketing will comply with those requirements and provide an appropriate non-confidential version or summary where required.

The Commission's published information policy recognises the confidential treatment of commercially sensitive information, while also providing for appropriate public versions of submissions.

GP Marketing's request for confidential treatment is therefore not intended to prevent the applicants from responding to the substance of the evidence. Rather, it is intended to protect commercially sensitive customer and transaction information while allowing the Commission to consider and verify the evidence for the purposes of the inquiry.

12. Conclusion

GP Marketing respectfully submits that the question of HDG HSS should be assessed by reference to the specific products and actual market evidence, rather than solely by reference to whether galvanised HSS products may theoretically perform similar functions.

In particular, GP Marketing is prepared to provide the Commission, separately and confidentially upon request, with evidence concerning actual purchases of HDG HSS by:

- ATM; and/or
- entities related to ATM

GP Marketing can also provide relevant HDG HSS item numbers to assist the Commission in testing:

- the applicants' purchasing records;
- purchases made through traders or intermediaries;
- relevant trader records, where available;
- the Commission's available import data; and
- the applicants' domestic production records.

GP Marketing respectfully submits that this evidence is capable of providing the Commission with an objective basis for assessing the actual commercial relationship between imported HDG HSS and the goods produced by the Australian industry.

Accordingly, GP Marketing respectfully requests that the Commission:

- take into account the additional transaction-level evidence which GP Marketing is prepared to provide confidentially;
- provide GP Marketing with an opportunity to submit that evidence to the Commission upon request;
- consider verifying the relevant transactions against the applicants' purchasing, production and sales records and, where appropriate, records of relevant traders or intermediaries;
- consider relevant import information available to the Commission, recognising that the importer of record may not necessarily be the ultimate purchaser;
- examine the domestic production of the specific HDG HSS item numbers and specifications identified by GP Marketing; and
- consider the above evidence before concluding that there is no new evidence warranting further consideration of the treatment of HDG HSS in Inquiry 710.

GP Marketing remains willing to cooperate fully with the Commission and to provide further information or supporting documentation as requested.

Yours faithfully,

GP Marketing International Pty Ltd