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Director Operations 2
Anti-Dumping Commission
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**Investigation 384 Alloy Round Bar exported from the People's Republic of China
Position Paper
Scope of the Goods Description**

Dear Director,

This submission is made on behalf of Milltech Pty Ltd (**Milltech**), an Australian based producer of a range of products that meet the description of the Goods under Consideration (**GUC**) for Alloy Round Bar (*Dumping Investigation No. 384*).

Hot-rolled solid sections of 'alloy steel', having round or near-round cross-sectional dimensions of not less than 9.5 millimetres (mm) and not greater than 98.5 mm, not in coil.

For the purpose of the description of the goods the subject of this application, 'alloy steel' here means steel containing a chemical composition that at least meets or exceeds the minimum chemical element proportions specified in Note (f) "Other alloy steel" to Chapter 72 under Schedule 3 of the Customs Tariff Act 1995 ("the Tariff") as appearing on the date of this application.

Commonly identified as 'rod', 'round bar', 'engineering bar', 'spring steel', 'alloy bar', 'high alloy bar', 'silico-manganese bar', 'grinding rod' or 'bar used for the production of grinding media', the goods covered by this application include all round or near-round hot-rolled solid sections of alloy steel bar meeting the above description of the goods regardless of the particular grade, coating, or minor modification of bar-end finish (including but not limited to, painting or chamfering).

Goods excluded from this application are:

- round or near-round hot rolled solid steel sections composed of:
 - o 'stainless steel' as defined under Note (e) "Stainless steel" to the Tariff; or*
 - 'high-speed steel' as defined under Note (d) "High speed steel" to the Tariff;**

- *steel reinforcing bar containing indentations, ribs, grooves or other deformations produced during the rolling process;*
- *steel rod in coil;*
- *chromium plated steel; and*
- *solid sections of steel which may be square, rectangular or hexagonal in cross-section.*

The hot-rolled alloy round bar products that Milltech produces in Australia include hot-rolled heat treated alloy round bar and surface treated alloy round bar.

- *Heat treated hot rolled bar is produced in a range of sizes (19mm to >98.5mm) and grades (4140, 4340, EN26 and others on enquiry)*
 - *SUPERQUENCH is the brand name for these products and references the heat treatment process most frequently applied ie. Quench and Temper process.*
- *Surface treated bar or "MARBRIGHT" as the Milltech range is known. Grade 4140 is the most prevalent "alloy round bar" to which a range of surface treatments are applied, with or without a prior heat treatment process.*
 - *The range of surface treatment processes applied by Milltech to its hot rolled products alloy round bar include turning, peeling& polishing, centreless precision grinding and rough machining.*

Milltech considers that a significant proportion of the goods that it produces meet the description and disagrees with the Commission's initial view proposed in the *Position Paper* that "additional heat treatments(s), and /or the additional surface treatments (s), result in the alloy round bar ceasing to be "hot rolled".¹ Milltech observes that the applicant has specifically excluded products such as stainless steel and chrome plated steel but has not excluded heat treated or surface treated products.

Milltech asserts that it is a member of the Australian Industry that produces like goods that has also suffered material injury as a result of dumped imports and would be happy to cooperate with the Commission's investigation, if required.

Yours sincerely,



Dean Taylor

Commercial Manager

¹ EPR No. 384/019 at p. 4.