

7th May, 2019

Sangeeta D'souza,
Assistant Director – Investigations Team 2,
Anti-Dumping Commission,
Department of Industry, Innovation and Science,
Level 35,
55 Collins St,
Melbourne VIC 3000

Dear Sangeeta,

In response to the "Scope of the Goods" Issues Paper uploaded to the Anti-Dumping Commission (ADC) website on 17th April, 2019 we would like to comment as follows:

Description of Goods

The following description was included by Galintel in their Application for the publication of dumping and/or countervailing duty notices Solid Base Angle exported from The People's Republic of China:

3. Fully describe your product(s) that are 'like' to the imported product:
- Include physical, technical or other properties.
 - Where the application covers a range of products, list this information for each make and model in the range.
 - Supply technical documentation where appropriate.
 - Indicate which of your product types or models are comparable to each of the imported product types or models. If appropriate, the comparison can be done in a table.

Galintel manufactures solid base angle, galvanised, in accordance with Australia and New Zealand Standard AS/NZ 4680:2006, with an R3 durability rating in accordance with AS/NZ 2699:2002, and load tested in accordance with AS/NZ 1170:2002.

The objective of the Australian Standard AS/NZS 4680:2006 is to specify the requirements of "hot-dip galvanized (zinc) coatings on fabricated ferrous articles". This Standard specifies requirements and tests for hot-dip zinc coatings on fabricated ferrous articles including structural steel, steel reinforcements, steel sheet fabrications, assembled steel products, tubular fabrications, fabricated wire work, steel forgings, steel stampings, ferrous castings, nails and other small components. The hot-dip galvanised coating on solid base angle manufactured by Galintel comply with the requirements of AS/NZ 4680:2006.

The objective of the Australian Standard AS/NZ 2699:2002 is to specify the requirements for "built-in components for masonry construction". AS/NZ 2699.3 specifies the requirements for durability of lintels and shelf angles. Solid base angle manufactured by Galintel comply with the requirements of AS/NZ 2699.3.

The objective of the Australian Standard AS/NZ 1170:2002 is to provide designers of structures with values representing the permanent actions, likely actions imposed due to use and occupancy, and other actions appropriate to the type of structure for use in structural design. Solid base angle manufactured by Galintel has been load tested in accordance with AS/NZ 1170:2002.

Galintel locally manufactured solid base angle are supplied in the following dimensions:

- 100mm x 100mm x 6mm in lengths ranging from 0.9 m to 2.7 m (in 0.2m increments); and
- 150mm x 100mm x 6mm in lengths ranging from 1.8 m to 4.0 m (in 0.2 m increments).

Please refer to Non-Confidential Attachment A-3.3 for Galintel's product brochure and specification details.

In their submission to the ADCommission dated 25th March, 2019 Nepean Engineering claim that the goods manufactured by Australian Rollforming Manufacturers Pty Ltd (ARM):

“Galintel does not consider that the goods manufactured by ARM compete directly with solid base angles as described in the goods description of Galintel’s application. ARM’s goods are of significantly different dimensions and lengths (Galintel up to 4 metres, whereas ARM produces 12 metre lengths), possess a lighter coating than solid base angles manufactured by Galintel, and are sold in different applications than solid base angles manufactured by Galintel. Galintel’s application is limited to the goods that match the goods description only.”

Steelforce contend that the above statement also applies to the Galforce Angles imported by Steelforce Trading as follows:

- 1) **“Significantly different dimensions and lengths”** – the Galforce Profiles can be supplied in sizes [REDACTED]
[REDACTED] ARM also supplies angles in sizes ranging from 25x25x2.5 to 150x100x6.0 in lengths ranging from 6 metres to 12 metres depending on the size. If “Galintel does not consider that the goods manufactured by ARM compete directly with solid base angles as described in the goods description of Galintel’s application.” then the same would apply to the Steelforce range.
- 2) **“Possess a lighter coating than solid base angles”** – Galintel® Solid Base Angles manufactured by Nepean Building and Infrastructure have a heavy hot dip galvanised coating of 600 g/m². Angles supplied by ARM have a Magnelis metallic steel coating. This “coating technology applies a hot-dip zinc, aluminium and magnesium coating using an innovative application. All profiles are coated to a ZM250 coating which guarantees a minimum of 200 g/m² coating ...” – refer “Duragal Profiles Availability Guide” published by Australian Rollforming and available on their website. [REDACTED]
[REDACTED] If “Galintel does not consider that the goods manufactured by ARM compete directly with solid base angles as described in the goods description of Galintel’s application.” then the same would apply to the Steelforce range.
There is a clear visible distinction between these three products which also relates directly to their suitability for “use in lintel applications (as defined by the AS/NZ 4680:2006, with an R3 durability rating in accordance with AS/NZ 2699:2002, and load tested in accordance with AS/NZ 1170:2002. These parameters define the goods for use in lintel applications.” – refer page 1 of the Nepean Building and Infrastructure submission uploaded to the Anti-Dumping Commission website on 26th March, 2019.

Regards

Paul Frazer
General Manager Manufacturing
STEELFORCE AUSTRALIA PTY LIMITED