



J.BRACIC & ASSOCIATES
TRADE REMEDY ADVISORS

PO Box 3026
Manuka, ACT 2603
Mobile: +61 499 056 729
Email: john@jbracic.com.au
Web: www.jbracic.com.au

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Director Operations 3
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

**Dumping investigation into precision pipe and tube exported from the
Socialist Republic of Vietnam**

Dear Director,

This submission is made on behalf of Vina One Steel Manufacturing Corporation (Vina) in response to the application by Orrcon Manufacturing Pty Ltd (Orrcon) for the publication of dumping and countervailing duties on precision pipe and tube steel exported from the Socialist Republic of Vietnam (Vietnam).

The purpose of this submission is to seek clarification and confirmation of the scope of goods falling within the parameters of the goods description. Clarification is requested to address existing confusion amongst the various documents on the public record, so that Vina may establish whether it is an exporter of the subject goods during the investigation period.

The goods subject of the application and subject to investigation as notified in ADN 2020/30 are:

Certain electric resistance welded pipe and tube made of carbon steel, whether or not including alloys, comprising circular, rectangular and square hollow sections in metallic coated and non-metallic coated finishes. Metallic finish types for the goods include galvanised and aluminised. Non-metallic finishes include hot-rolled and cold-rolled.

Sizes of the goods are, for circular products, those equal to or less than 21 millimetre ("mm") in outside diameter. Also included are air heater tubes to Australian Standard (AS) 2556, up to and including 101.6 mm outside diameter.

For rectangular and square products, those with a thickness of less than 1.6 mm (being a perimeter up to and including 260 mm).

Included within the goods are end-configurations such as plain, square-faced and other (e.g. threaded, swaged and shouldered).

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The goods include all electric resistance welded pipe and tube made of steel meeting the above description of the goods (and inclusions), including whether the pipe or tube meets a specific structural standard or is used in structural applications.

Oval and other shaped hollow sections which are not circular, rectangular or square, are excluded from the goods.

It is clear from the above description that the investigation of rectangular products are limited to those with thickness less than 1.6mm and a perimeter up to and including 260mm. However, it is noted that Appendix 1 to ADN 2020/30 includes the Commission's proposed model control code structure, with the thickness category showing the following three distinct thickness ranges:

9	Thickness	<1.6 mm	A
		≥1.6 mm to <3.2 mm	B
		≥3.2 mm	C

Likewise, it is noted that Orrcon included its preferred model control code structure in its application, with the following five distinct thickness ranges. Of these five thickness ranges, only two covered products of thickness less than 1.6mm.

6	Thickness	≤1.5mm	A
		>1.5mm to 1.6 mm	B
		>1.6mm to 2 mm	C
		>2mm to 3.2 mm	D
		>3.2 mm	E

Vina requests the Commission to clarify and confirm that as far as rectangular products are concerned, the investigation is limited only to tube products of a **nominal thickness** less 1.6mm. Therefore, the remaining thickness ranges outlined in the model control code structure (Identifiers B and C), relate only to circular pipe products covered by the investigation.

We look forward to your earliest confirmation.

Yours sincerely

John Bracic