

Received by email on 21 April 2020

Hi Corey,

I noted above Investigation, and was shocked to see the inclusion of air heater tubes to Australian Standard (AS) 2556 I have been involved in importing specialised steel tubing (mainly product that is not produced in Australia) for over 40 years. The market for air heater tube is very limited and restricted to supply of existing air heater tubes [XXXXXXX].

Based on experience we see demand of only around 50 -100 metric tonnes per year. We received an order for approx. 52m/t last year and lost another to another importer for approx. 30 m/t ex-China.

I was involved in the original dumping investigation on Hollow Structural sections long ago (maybe over 20 years ago) and at that time pressed to have Air heater tubes to AS2556 excluded from any dumping action - which they were, and continue to be.

As I am importer, I do not enquire with the local producers concerning availability, however one of my customers BTP Specialists Pty Ltd (BTP) is very familiar with the market and advises that Orrcon have not been in a position to supply Air heater tube to AS2556 for around 20 years. They are aware the last air heater tube order Orrcon produced was back around June 2001-June 2002. After accepting the order, Orrcon advised they could not arrange the ends square cut as per the specification, and only dimple cut (squashed cut) was possible – this was rejected and in the end Orrcon agreed to supply the tubes longer and square cutting to be arranged by the customers fabricator at Orrcon's expense – Orrcon advised they would not offer the specification again. BTP have continued to check with Orrcon with fresh enquiries around 6 times over approximately last 17-18 years and most recently last week as below. I understand Orrcon are also unable to arrange the expanding test required under the specification which is critical.

Following my advice about this new action, BTP contacted Orrcon Steel Brisbane, 920 Nudgee Rd, Banyo QLD 4014 (07) 3873 9233 on Friday 17th April 2020 and spoke to a Customer Service Officer/Estimator at Orrcon Steel who has been in the industry for over 40 years who advised Orrcon do not make Air Heater Tube and such demand would need to be imported.

I have no objection with the dumping enquiry which I understand mainly concerns tubes up to 21mm OD, however air heater tubes up to 101.6mm OD? For your reference we have never imported air heater tube under 40mm OD, and have not known of demands for same.

It is not fair for the very limited number of users of air heater tube to be involved in this investigation and below should be removed from the subject of the application (the goods): “Also included are air heater tubes to Australian Standard (AS) 2556, up to and including 101.6 mm outside diameter”.

Could you please confirm thanks.

Regards
Brad Schweikert

General Manager – Steel Tubular Products.
JFE Shoji Australia Pty Ltd