

**Steelforce Trading Pty Ltd**

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8 April 2020

The Director – Investigations 3  
Anti-Dumping Commission  
GPO Box 2013  
CANBERRA ACT 2601

**BY EMAIL:** [investigations3@adcommission.gov.au](mailto:investigations3@adcommission.gov.au)

Dear Director,

**Investigation No. 550 concerning dumping of Precision Pipe and Tube Steel exported to Australia from China, Korea, Taiwan and Vietnam and subsidisation relating to exports from China and Vietnam**

**IMPORTER SUBMISSION – MODEL CONTROL CODES**

Steelforce Trading Pty Ltd (**Steelforce Trading**) makes the following observations concerning the model control codes (**MCCs**) proposed by the Anti-Dumping Commission (**Commission**) at initiation of Investigation 550<sup>1</sup>.

We consider the sub-categories defined in Category-2 (*Steel Base/Type*) to be confusing in that they reference different characteristics of the goods under consideration (**GUC**), not different selection options for a given characteristic. Firstly, the method of production of the coil is available for selection as either “hot-rolled” or “cold-rolled”. Next, a metallic coating is available to be selected ie. galvanised. The last sub-category references chemistry of the steel in that “other eg. alloy steel” can be selected.

These sub-categories as defined, by their nature, will mean that importers and exporters will have great difficulty, or indeed be incapable, of accurate reporting. For example, a product may be “hot rolled”, “galvanised” (i.e. HDG) and “alloyed”. In such an example, we do not understand how we would be able to accurately and completely report all the applicable identifiers within Category-2. The goods description further references metallic finish types to include “galvanised” and “aluminised”. While “galvanised” is included as an identifier in Category-2, “aluminised” is not.

<sup>1</sup> Appendix 1 to ANTI-DUMPING NOTICE No. 2020/030

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It should further be noted that the goods description includes the statement “Non-metallic finishes include hot-rolled and cold-rolled”. It is concerning that the terms “hot-rolled and cold-rolled” are used in the goods description as types of “finish” i.e. a surface characteristic when they are commonly used to describe different production methods.

For the reasons outlined above, Steelforce Trading proposes the following amendments to the MCC categories (in relevant part):

	Category	Sub-category	Identifier	Sales data	Cost data
...	...	...	...	...	...
2	Coil production method	Hot rolled	H	Mandatory	Mandatory
		Cold rolled	C		
2A	Chemistry	Alloyed	A	Mandatory	Mandatory
		Non-alloyed	N		
...	...	...	...	..	...
4	Finish	Oiled	O	Mandatory	Mandatory
		Painted (incl. varnished)	P		
		Galvanised	G		
		Aluminised	A		
		None	N		
...	...	...	...	...	...

The Commission’s consideration of these matters and appropriate amendment approvals are sought by Steelforce Trading to enable accurate completion of the importer questionnaire response. Steelforce Trading also requests an extension of nine days (to 30 April 2020) (assuming the Commission’s timely consideration and approval of the above (and possibly other) amendments to the MCCs) to accommodate the unprecedented current remote working challenges and the Easter holiday period.

FOR AND ON BEHALF OF THE IMPORTER

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