

06 May 2020

The Director  
Investigations 3  
Anti-Dumping Commission  
GPO Box 2013  
Canberra ACT 2601  
Australia

By email: [investigations3@adcommission.gov.au](mailto:investigations3@adcommission.gov.au)

Dear Dave,

I would like to make submission on behalf of Romak Hardware Distributors in relation to:

**Anti-Dumping Notice No. 2020/030**  
**Public notice under section 269TC(4)**  
**Of the Customs Act 1901**

**Precision pipe and tube steel**

**Exported to Australia from the People's Republic of China,  
The Republic of Korea, Taiwan and the Socialist Republic of Vietnam**

**Initiation of Investigation No.550 into  
Alleged dumping and subsidization**

**1. Purpose of this submission**

The purpose of our submission is to express Romak's opposition to the views expressed in the Application that the Australian industry has suffered material injury from Taiwanese exports (where we sourced our chrome finish steel tube) which have been sold at artificially low prices through dumping and subsidy practices in Taiwan and which are therefore contrary to the Act.

**2. Background**

The business of Romak

(a) Romak is an Australian company established in 1990 which operates out of its registered office in Dandenong South, Victoria. Romak supplies Australian retailers with a wide range of hardware products and distributing them nationally (company and product range refer [www.romak.com.au](http://www.romak.com.au))

(b) Additionally, Romak provides custom made products to retailers and assumes control over the designing, manufacturing and sourcing of those products from overseas. It distributes and delivers hardware products throughout Australia.

### 3. Description of goods imported by Romak and potentially the subject of the Investigation

Romak imports a range of chrome tubing as well as fitting which are predominantly used in bathroom. The specific products subject to this investigation in Romak item range are listed below:

Item No.	Description	Tariff code
28400	STEEL ROUND TUBE Chrome Plated 1500x19mmx0.7mm	7306.50.00
28401	STEEL ROUND TUBE Chrome Plated 2100x19mmx0.7mm	7306.50.00
28402	STEEL ROUND TUBE Chrome Plated 2400x19mmx0.7mm	7306.50.00
28405	STEEL ROUND TUBE Chrome Plated 900x16mmx0.7mm	7306.50.00
28406	STEEL ROUND TUBE Chrome Plated 1200x16mmx0.7mm	7306.50.00
28407	STEEL ROUND TUBE Chrome Plated 1800x16mmx0.7mm	7306.50.00
28408	STEEL ROUND TUBE Chrome Plated 2700x16mmx0.7mm	7306.50.00
28409	STEEL ROUND TUBE Chrome Plated 3600x16mmx0.7mm	7306.50.00
28411	STEEL ROUND TUBE Chrome Plated 900x19mmx0.7mm	7306.50.00
28412	STEEL ROUND TUBE Chrome Plated 1200x19mmx0.7mm	7306.50.00
28414	STEEL ROUND TUBE Chrome Plated 1800x19mmx0.7mm	7306.50.00
28418	STEEL ROUND TUBE Chrome Plated 2700x19mmx0.7mm	7306.50.00
28419	STEEL ROUND TUBE Chrome Plated 3600x19mmx0.7mm	7306.50.00
28424	STEEL ROUND TUBE Chrome Plated 900x25mmx0.7mm	7306.50.00
28425	STEEL ROUND TUBE Chrome Plated 1200x25mmx0.7mm	7306.50.00
28426	STEEL ROUND TUBE Chrome Plated 1800x25mmx0.7mm	7306.50.00
28428	STEEL ROUND TUBE Chrome Plated 2700x25mmx0.7mm	7306.50.00
28429	STEEL ROUND TUBE Chrome Plated 3600x25mmx0.7mm	7306.50.00
28611	STEEL OVAL TUBE 1200mmx0.7mm Chrome Plated	7306.69.00
28612	STEEL OVAL TUBE 1800mmx0.7mm Chrome Plated	7306.69.00
28613	STEEL OVAL TUBE 2400mmx0.7mm Chrome Plated	7306.69.00
28615	STEEL OVAL TUBE 3600mmx0.7mm Chrome Plated	7306.69.00

**Product picture**

Item No.	Description		
28400	STEEL ROUND TUBE Chrome Plated 1500x19mmx0.7mm		
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28612	STEEL OVAL TUBE 1800mmx0.7mm Chrome Plated		
28613	STEEL OVAL TUBE 2400mmx0.7mm Chrome Plated		
28615	STEEL OVAL TUBE 3600mmx0.7mm Chrome Plated		

I would like to present to you the follow products which are the fittings for the above tubing for bathroom and wardrobe hanging below. Although these products are not subject to investigation, but it shows and proves Romak tubing range is not used for industrial and construction purpose. Rather it is for domestic DYI purpose.

**Fittings imported by Romak to accommodate tubing**

No.	Description	Pack unit	Product picture
87219	ROUND TUBE 16MM PILLAR END CP	Bulk pack	
872190	ROUND TUBE 16MM PILLAR END CP	Retail prepack of 2	
87229	ROUND TUBE 19MM PILLAR END CP	Bulk pack	
872290	ROUND TUBE 19MM PILLAR END CP	Retail prepack of 2	
87239	ROUND TUBE 25MM PILLAR END CP	Bulk pack	
872390	ROUND TUBE 25MM PILLAR END CP	Retail prepack of 2	
87319	ROUND TUBE 16MM CENTRE PILLAR CP	Bulk pack	
873190	ROUND TUBE 16MM CENTRE PILLAR CP	Retail prepack of 2	
87329	ROUND TUBE 19MM CENTRE PILLAR CP	Bulk pack	
873290	ROUND TUBE 19MM CENTRE PILLAR CP	Retail prepack of 2	
87339	ROUND TUBE 25MM CENTRE PILLAR CP	Bulk pack	
873390	ROUND TUBE 25MM CENTRE PILLAR CP	Retail prepack of 2	
87419	ROUND TUBE 16MM FLANGE OVAL BASE CP	Bulk pack	
874190	ROUND TUBE 16MM FLANGE OVAL BASE CP	Retail prepack of 2	
87429	ROUND TUBE 19MM FLANGE OVAL BASE CP	Bulk pack	
874290	ROUND TUBE 19MM FLANGE OVAL BASE CP	Retail prepack of 2	
87439	ROUND TUBE 25MM FLANGE OVAL BASE CP	Bulk pack	
874390	ROUND TUBE 25MM FLANGE OVAL BASE CP	Retail prepack of 2	
87449	ROUND TUBE 16MM FLANGE ROUND BASE CP	Bulk pack	
874490	ROUND TUBE 16MM FLANGE ROUND BASE CP	Retail prepack of 2	
87459	ROUND TUBE 19MM FLANGE ROUND BASE CP	Bulk pack	
874590	ROUND TUBE 19MM FLANGE ROUND BASE CP	Retail prepack of 2	
87469	ROUND TUBE 25MM FLANGE ROUND BASE CP	Bulk pack	
874690	ROUND TUBE 25MM FLANGE ROUND BASE CP	Retail prepack of 2	

4. Source / Sales / Cost data of imported tubing **{Confidential – FOR OFFICIAL USE ONLY}**

[Redacted content]

5. Conclusion

We hope that the information included in this submission is sufficient to help the Commissioner consider not to impose anti-dumping / countervailing on the tubing products identified, or at least the product range imported by Romak Hardware. As stated earlier, Romak has been importing and wholesaling this product range for more than 20 years and the profitability has been on reasonable level. If the anti-dumping / countervailing for Romak chrome tubing range is imposed I am afraid the current market will be distorted.

We look forward to continuing to assist the ADC throughout the investigation and we would welcome the opportunity to discuss any of the issues raised in this submission further at the ADC's request. My contact details are as follows:

Name: Eddie Wu

Email: [eddie@romak.com.au](mailto:eddie@romak.com.au)

Contact number: 0409215355

Your sincerely

Eddie Wu



Company Director