

The Commissioner  
Australian Anti-Dumping Commission  
55 Collins Street  
Melbourne, Victoria  
Australia

**BBV SYSTEMS CO., LTD.**  
111/34-36, Fast Fac Bldg,  
Moo 2, Phaholyothin Rd.  
Lamsai, Wangnoi, Ayutthaya,  
Thailand 13170

บริษัท บีบีวี ซิสเต็มส์ จำกัด  
111/34-36 โครงการฟาสต์แฟค  
หมู่ที่ 2 ถ.พหลโยธิน  
ต.ลำไทร อ.วังน้อย  
จ. พระนครศรีอยุธยา 13170

Tel. : (66) 035 387 290  
Fax : (66) 035 387 295  
E-mail : info@bbv-systems.co.th  
Web : www.bbv-systems.co.th

27 May 2022

Page: 1 of 2

Dear Commissioner

**Re 601: Exports of BBV-Systems Thailand 500N Prestressed Thread Bar to IDE Australia**

I refer to International Drilling Equipment's (IDE) application for a duty assessment lodged on 8 January 2020, in respect of steel reinforcing bar (rebar) exported to Australia from Thailand.

[Detailed Response setting out reasons for seeking an exemption.](#)

In support of IDE's (the importer) application, BBV-Systems currently only export 500N Thread Bar, which is NOT used in reinforced concrete, but rather in a Prestressed Thread bar application (with ACRS Certification) for example, as soil nails for embankment stabilisation (see below figure). To my knowledge no Australian manufacturer is producing such Prestressed thread bar. Therefore BBV-Systems / IDE are NOT competing in the rebar for reinforced concrete market in Australia, but rather in a specialised field of Prestressed Products with applications, for example, in embankment stabilisation.



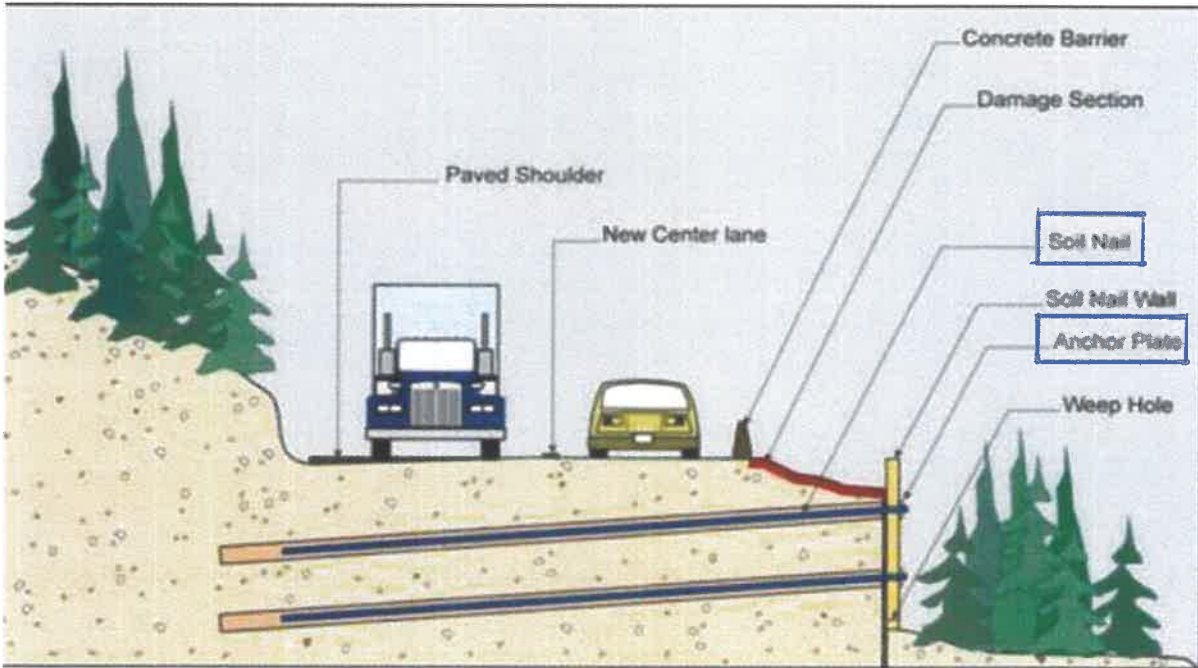


Figure 1. Soil Stabilisation using 500N Bar example

Yours Sincerely

Ingo Stroehler  
CEO SEA & Australia  
BBV-Systems Co., LTD