

NOT CONFIDENTIAL

28/09/18

The Commissioner
Anti-Dumping Commission
55 Collins Street
MELBOURNE VIC 3000

By email: clientsupport@adcommission.gov.au

Dear Commissioner

Application seeking an exemption from anti-dumping duties

We would like to seek an exemption from anti-dumping duties which have been imposed on steel reinforcing bar supplied by companies in Thailand.

Details of applicant

International Drilling Equipment
6A Bessemer Street, Blacktown, NSW, 2148

Contact person

Steve Dubé
Sales Manager
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Applicant's interest as an affected party

International Drilling Equipment is an importer and supplier of grade 500N BBV Systems (Thailand) threadbar rolled by Millcon (Thailand) which we consider may fall under the current goods description for steel reinforcing bar.

IDE imports this product because the rib geometry is completely different from reinforcing steel bars. It is a continuously rolled coarse thread onto which steel nuts and couplers can be screwed anywhere along the entire length of the threadbar. This is impossible with standard stock reinforcing bars as they are not threaded.

Our clients use threadbar in ground anchoring applications such as for rock bolting/anchoring as well as soil nailing. In those variable ground conditions, the length of the threadbar can readily be modified on site because the continuous thread allows for couplers/joiners to be used to extend the bars and for end anchorage such as nuts and plates to be installed at any position along the threadbar. I have attached several road and tunnelling project drawings precisely specifying threadbar.

Furthermore, Design Engineers specify and insist on threadbar instead of reinforcing bars because machining a thread on the later reduces the strength of the bar at that location and also has significant lead-times, especially because the threads often have to be cleaned after galvanizing. Therefore threadbar cannot be substituted with reinforcing bars.

Details of other parties likely to have an interest in this exemption application and what their interests may be

LibertyOnesteel produces a reinforcing steel grade 500 threadbar called Reidbar in 16, 20, 25 & 32mm diameters. LibertyOnesteel does not produce threadbar in 40mm diameter as demonstrated on the attached table from OneSteel's brochure and ACRS certificate.

Commonwealth Steel (Comsteel) produces grade 500 reinforcing steel bars but not as a threadbar. Refer to the attached ACRS certificate and company brochure.

Grounds on which the exemption is being sought

Exemption One – Like or directly competitive goods are not offered for sale in Australia to all purchasers on equal terms under like conditions having regard to the custom and usage of trade.

Details of anti-dumping and countervailing measures applying to steel reinforcing bar

The goods subject to measures are:

- Hot-rolled deformed steel reinforcing bar whether or not in coil form;
- Commonly identified as rebar or debar;
- In various diameters up to and including 50 millimetres;
- Containing indentations, ribs, grooves or other deformations produced during the rolling process; and
- Regardless of the particular grade or alloy content or coating.

The goods are classified to the following subheadings in Schedule 3 to the Customs Tariff

| Tariff subheading | Statistical code |
|--------------------------|-------------------------|
| 7213.10.00 | 42 |
| 7214.20.00 | 47 |
| 7227.90.10 | 69 |
| 7227.90.90 | 01, 02, 04 |
| 7228.30.90 | 40 |
| 7228.30.10 | 70 |
| 7228.60.10 | 72 |

The countries subject to measures are Korea, Singapore, Spain, Taiwan, China, Indonesia, Greece and Thailand.

On 7 March 2018, anti-dumping measures, in the form of interim dumping duties were imposed on rebar exported from Thailand. Exceptions are listed in the Dumping Commodity Register.

Detailed statement setting out reasons for seeking an exemption

The Australian steel bar producers do not make the 40mm threadbar equivalent to those that we import and we should therefore not have to pay anti-dumping duty.

If you have any questions regarding this application, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Steve Dubé', written over a horizontal line.

Steve Dubé
Sales Manager
International Drilling Equipment