



19 June 2019

Investigations 3
Anti-Dumping Commission
Level 35, 55 Collins Street
Melbourne VIC 3000

BY EMAIL:

Investigations3@adcommission.gov.au

Dear Mr Hawke,

Re.: Exemption Inquiries Nos. EX0070, EX0071 and EX0072 concerning steel reinforcing bar exported from the People's Republic of China, Greece, the Republic of Indonesia, the Republic of Korea, Singapore, the Republic of Spain, Taiwan and the Kingdom of Thailand

SUBMISSION OF THE AUSTRALIAN INDUSTRY PRODUCER

Liberty OneSteel (Newcastle) Pty Ltd (**Liberty Steel**), a member of the Australian industry producing like goods to the subject goods, advises the Anti-Dumping Commission (**Commission**) of the following concerns relating to the above exemption inquiries.

1. The importer's views on substitutability are misleading

In a letter dated 13 May 2019, the importer responds to the Commission's question,

Can you advise whether REIDbar at 25mm and 32mm diameters would be possible to substitute to the exemption good 28mm and 40mm diameters?

in a simplistic, but misleading manner, by saying,

The sort (sic) answer is no because they have a smaller cross-section area and they are not as strong.¹

The importer then proceeds to include yield point details for each of the different sized products. With respect, the yield point (force applied in kilo-Newtons) will necessarily differ for each of the different sizes specified i.e. 25mm, 28mm, 32mm and 40mm as a larger cross section will require more force to break during a tensile test. However, what does not differ; and therefore, the appropriate characteristic to compare; is the minimum yield stress or minimum yield strength (force per unit area in MPa or Newtons per square millimetre). Whether considering REIDbar or

¹ EPR Folio No. EX0070, EX0071 and EX0072/007 at Pg 1



the imported 28mm and 40mm threaded bar, these goods are all made to the identical Standard and grade i.e. AS/NZS 4671:2001 grade 500N, as confirmed by the brochure extracts for REIDbar and BBV500N. Of such importance is this characteristic for anyone wishing to use these goods, the minimum yield strength of 500MPa required for this grade is reflected in the imported product's name i.e. BBV500N.

Liberty Steel strongly reiterates the position expressed in an earlier submission² that if 28mm and 40mm threaded bar were to be exempt from the dumping duties which currently apply, then these bars would not only compete directly with 28mm and 40mm domestically-produced rebar, but also, domestically produced 25mm and 32mm threaded bar, as projects could be adapted to substitute these different sizes. Liberty Steel notes that the BBV500N brochure lists “Concrete Reinforcement Steel Bars” at the top of the list of applications for this product, thus confirming their use or substitutability in applications where rebar is used.³

Liberty Steel further notes that the extrinsic, descriptive material for the imported goods provided to the Commission is misleading in that the illustration shows the threaded bar along with the accessories available such as couplings and connectors, whereas, it is only the bar that constitutes the description of the exemption goods the subject of these inquiries. The Commission should be in no doubt that absent the accessories depicted in the descriptive material, the bar is very similar in appearance and meets the same chemical and mechanical properties to the 500N rebar and threaded bar produced by Liberty Steel.

2. Australian Border Force officials will have difficulty discerning threaded bar, if exempt, from rebar

The ability of import clearance officials to verify whether an imported deformed bar is indeed a threaded bar or not remains a significant area of concern for the Australian industry due to the risk of misdescription this represents. Accordingly, Liberty Steel provides the following photograph to demonstrate the similarity between three different types of deformed bar produced through its Australian facilities. Shown below are samples of:

- 20mm REIDbar (having a right-hand thread pattern);
- 20mm threaded bar (having a left-hand thread pattern and slightly smaller rib spacing);
- and
- 20mm reinforcing bar (rebar, in this case having transverse and longitudinal ribs).

² EPR Folio No. 008 (Liberty Steel letter to ADC)

³ EPR Folio No. EX0070, EX0071 and EX0072/007 at Pg 3



The imported goods, whether they be reinforcing bar or threaded bar will have a range of different rib patterns as this aspect is not defined by a Standard, rather the proportion of the bar surface requiring deformations to be present. The Standard to which the imported threaded bar, and domestic rebar is being produced, namely AS/NZS 4671:2001 states:

The reinforcing steels shall have two or more rows of parallel transverse ribs or indentations equally distributed around the circumference and with a uniform spacing along the entire length except identifying markings. For ribbed bars, longitudinal ribs may or may not be present.

This range of different rib patterns for hot-rolled steel deformed bar (whether continuously threaded or not) further complicates assessment of which bar is threaded and which is not if an exemption was to be granted for the threaded bar from any of the countries to which the exemption inquiries applies i.e. China, Greece, Indonesia, Korea, Singapore, Spain, Taiwan and Thailand.

Given the technical nature of this submission, please do not hesitate to contact your Liberty Steel representative contact with any questions or if you require any further demonstration of the material presented above.

FOR AND ON BEHALF OF THE

AUSTRALIAN INDUSTRY PRODUCER