

Staughtons Trade Advisory Group Pty Ltd
ABN 65 605 424 459
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PUBLIC RECORD VERSION

The Director, Investigations 1,
Anti-Dumping Commission,
GPO Box 2013,
CANBERRA ACT 2601,
AUSTRALIA.

By Email: investigations1@adcommission.gov.au
August 21st 2020.

EXEMPTION INQUIRY No 0079
Anti-Dumping Notice No 2020/84
ERW Hot Dipped Galvanised Shouldered Pipes
Infrabuild Trading Pty Ltd.

Dear Director,

We refer to the public record response by the local producer Orrcon to Infrabuild Trading's exemption application on what we believe is clearly identified as being imported ERW Hot Dipped Galvanized steel pipe (HDGP) of 165.1mm O/D from China.

Our concern with the Orrcon response is the redactions in the public record responses to sections 'E' and 'F' of the Commission's document which in our opinion, contrary to the Commission's stated requirement, do not provide a reasonable understanding of what Orrcon claim to be it's capability to produce identical , like or directly competitive goods to the HDGP in question.

Clearly Orrcon's response does state , inter alia, the following:-

- The company Opposes the request for exemption -Section 'B';
- The company does not make identical goods -Section 'C 1';
- The company does not make like or directly competitive to the subject goods -Section 'D 1';
- **The company does however possess the capability to produce identical or like or directly competitive products -Section 'E 1', being HDGP in steel grades C 250 and C 350 compliant with AS 1074, AS /NZS 1163.**

Section E.3 response only seems to state that what has been supplied is 150 NB XL pipe and that this pipe has been supplied to the Mining, Fire Protection, Engineering Construction, and Agricultural sectors which demonstrates that the company does have the existing capability to fabricate and galvanise pipe..

Given that we clearly identify the goods in the application for exemption as being HDGP and that factually Orrcon has no capability to hot dip galvanise pipe we would like clarification on the galvanised coating of the pipe Orrcon is referring to eg; is it pre-galvanised pipe or black pipe sent to an external galvanising facility. Orrcon's redacted response to Section 'F.1' does not, on our reading, provide any reasonable understanding of ,let alone any clarification, of the galvanised coating it refers to.

Orrcon is on the record in relation to Exemption Inquiry Report EX 0015 that it did not object to the granting of an exemption on ERW HDGP (para 5.2) and in response to the imposition of measures from Report No 177, Orrcon's submission to the then TMRO stated that 'Hot Dipped Galvanised Pipe is not manufactured in Australia'.

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We also take this opportunity to note that the website for InfraBuild Steel Centre states the following in relation to ‘Shouldered Pipe’-

‘InfraBuild Steel Centre (formerly LIBERTY OneSteel Metalcentre) **manufactures shouldered pipe** as part of a solutions -oriented offering that utilises its broad supply base and extensive experience’ (emphasis added)

In relation to the Orrcon response we respectfully submit that the Commission request Orrcon to provide a revised response to Sections ‘E 3’ and ‘F 1’ of the Response to An Application for Duty Exemption that provides a more reasonable understanding of the company’s capability to produce HDGP.

Regards,

M J Howard