

Our ref: **ATH:20211597**

Your ref:

Direct dial: 03 9321 7851

Direct email: ahudson@rigbycooke.com.au

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29 September 2021

The Commissioner of the Anti-Dumping Commission
GPO Box 2013, Canberra ACT 2600

By Email: clientsupport@adcommission.gov.au

Dear Commissioner of the Anti-Dumping Commission,

Pillar Products Pty Ltd
Taskmaster Hardware Australia Pty Ltd
Joint Application for exemption from dumping duty and countervailing duty
NON-CONFIDENTIAL

We confirm we act for Pillar Products Pty Ltd (**Pillar**).

As a result of the decision by the Minister for Industry, Science and Technology in respect of Dumping and Subsidisation Investigation Number 550 (**the Investigation**), there are now dumping and countervailing duties payable on certain steel pipes and tubes exported to Australia from the People's Republic of China (**China**) and the Republic of Korea (**Korea**) following an application lodged by Orrcon Manufacturing Pty Ltd (**Orrcon**). We are instructed to make an application for an exemption (**the Application**) so that certain steel curtain rods (**Goods**) imported by Pillar and Taskmaster Hardware Australia Pty Ltd (**TMH**), (collectively, the **Applicants**) may be excluded from the dumping and countervailing duty measures.

We have been instructed to make a joint exemption Application on behalf of both Pillar and TMH, as both importers import identical Goods from the same exporter. Kon Vrakatselis of the Anti-Dumping Commission approved this joint approach in an email dated 6 September 2021.

1 Applicants Details

1.1 We confirm the applicants in relation to this Application are Pillar and TMH.

(a) Pillar's details are as follows:

- (i) Primary contact: Aaron Phipps.
- (ii) Email: aaronp@pillarproducts.com.au.
- (iii) Telephone: 0418 104 438 / 1300 155 355.
- (iv) Street Address: 48-50 Access Way, Carrum Downs VIC 3201.

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- (v) Postal Address: 48-50 Access Way, Carrum Downs VIC 3201.
- (vi) ABN: 47 165 299 187.
- (b) TMH's details are as follows:
 - (i) Primary Contact: Wayne Smart.
 - (ii) Email: w.smart@taskmasterhardware.com.au.
 - (iii) Telephone: +61 3 8773 4455 / 0417576587.
 - (iv) Street Address: 73 Boundary Road Carrum Downs Victoria 3201.
 - (v) Postal Address: 73 Boundary Road Carrum Downs Victoria 3201.
 - (vi) ABN: 75 146 330 636.

1.2 Pillar was established in 2013 and since February 2016, Pillar has sold steel curtain rods in Australia, through hardware store retailer Bunnings Warehouse Group Ltd.

1.3 TMH was established in 1986 and since 2016, TMH has sold steel curtain rods in Australia, through hardware store retailers Mitre 10 Australia Pty Ltd and Home Timber & Hardware Group Pty Ltd.

2 Relevant Facts

2.1 In support of this Application, we are instructed as follows:

- (a) The Applicants have imported and continue to import the Goods from China which can be more accurately described as cold-rolled steel tubing/pipe to be used as Curtain Rods.
 - (i) Pillar has been importing the Goods under tariff heading 7306.30.00.
 - (ii) TMH has been importing the Goods under tariff heading 7306.30.00.
- (b) Due to the findings of the Investigation, the Applicants are required to pay dumping and countervailing on the Goods.
- (c) The goods subject to Investigation 550 are:

Certain electric resistance welded pipe and tube made of carbon steel, whether or not including alloys, comprising circular, rectangular and square hollow sections in metallic coated and non-metallic coated finishes. Metallic finish types for the goods include galvanised and aluminised. Non-metallic finishes include hot-rolled and cold-rolled. Sizes of the goods are, for circular products, those equal to or less than 21 millimetres ("mm") in outside diameter. Also included are air heater tubes to Australian Standard (AS) 2556, up to and including 101.6 mm outside diameter. For rectangular and square

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products, those with a nominal thickness of less than 1.6 mm (being a perimeter up to and including 260 mm). Included within the goods are end-configurations such as plain, squarefaced and other (e.g. threaded, swaged and shouldered). The goods include all electric resistance welded pipe and tube made of steel meeting the above description of the goods (and inclusions), including whether the pipe or tube meets a specific structural standard or is used in structural applications. Oval and other shaped hollow sections which are not circular, rectangular or square, are excluded from the goods.

2.2 The relevant tariff classifications subject to the Investigation are:

- (a) 7306.30.00 (statistical code 30)
- (b) 7306.50.00 (statistical code 45)
- (c) 7306.61.00 (statistical code 21)
- (d) 7306.69.00 (statistical code 10)

2.3 For the reasons set out below, the Applicants are of the view that the Goods which they have imported and continue to import should not be subject to dumping and countervailing duty as, pursuant to paragraphs 8(7)(a) and 10(8)(a) of the *Customs Tariff (Anti-Dumping) Act 1975 (Anti-Dumping Act)*, 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.

2.4 On that basis we would request that an exemption from the dumping and countervailing duty measures be granted in respect of the Goods.

3 Dumping Manual

3.1 The meaning of “like goods” is considered in section 2 of the Department of Industry, Innovation and Science (**Department**) Dumping and Subsidy Manual dated November 2018 (**Dumping Manual**). In our view the Goods are not like goods as described in the Dumping Manual due to the reasons set out below.

The Goods are not Like Goods – Physical Likeness / Functional Likeness / Other Considerations

- (a) The Goods that are imported by the Applicants are curtain rods that have a 16mm outside diameter and a 0.4mm gauge/wall thickness. They come in both powder-coated (Black/White/Ivory) and electroplated (Brushed Chrome). The curtain rods come in lengths 1.5, 2.0, 2.5 and 3.0m, and are individually heat/shrink wrapped and labelled. Please refer to attachment 1 for a photograph of a sample curtain rod. The curtain rods are made of A class hot-rolled strip metal comprising of 0.12% Carbon and are made using a roll forming process and a longitudinal welding technique.

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- (b) The Goods are designed and manufactured for a specific purpose, to be used as curtain rods, and the Goods have no other use apart from being used as a curtain rod. Due to its use being that of a curtain rod, the Goods are made with a very thin wall thickness and could not be used for any alternate purpose. Please see attachment 2 for a diagram of the curtain rod.
- (c) The end use of the goods subject to the Investigation as described in the original application made by Orrcon for dumping and countervailing duties dated 31 March 2020 (refer to page 14) are:

Locally produced non-alloy and imported non-alloy and alloyed precision pipe and tube are used for a range of purposes including fencing, furniture manufacturing, shelving and racking, heat exchangers, outdoor patio structures, exhaust systems and other general mechanical or manufactured end-use applications.¹

- (d) The Goods are not fit to be used for purposes other than as curtain rods and are certainly not fit for use in the manners described above. In light of the above we do not consider the Goods to have a physical, functional or other likeness to the goods subject to measures. In those circumstances, we believe the Goods are not readily available in the Australian marketplace, and on that basis, seek an exemption in relation to the dumping and countervailing duty payable on the Goods.

4 Australian Producers

- 4.1 Prior to mid-2021, Pillar purchased the Black/White/Ivory curtain rods from an Australian supplier, Rollcraft Pty Ltd (**Rollcraft**). Rollcraft did not produce the electroplated (Brushed Chrome) curtain rods, and so Pillar sourced these from Foshan Fubosi Hardware Products Factory (**FFHP**), a manufacturer in China. TMH also purchased the Goods from Rollcraft from early 2016 until it switched to FFHP from March 2018. Rollcraft sent an email to Pillar on 22 March 2021, advising the following:

"Rollcraft will cease manufacturing of the 16mm curtain rods around 1/7/21".

Please refer to attachment 3 for a copy of this email.

- 4.2 As a result, Pillar tried to find a suitable alternative Australian manufacturer of the Goods, however no suitable Australian manufacturer could be found. As a result, Pillar looked overseas for a manufacturer who could produce the Goods.
- 4.3 Pillar contacted FFHP (as FFHP was already producing the electroplated (Brushed Chrome) curtain rods for Pillar) who advised it could produce the Goods. Pillar subsequently placed orders with FFHP, and were thereafter notified by the Australian Border Force (**ABF**) that the Goods were subject to the Investigation.

¹ Orrcon's original application, page 14.

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- 4.4 The Applicants are confident that there are no other manufacturers in Australia that can produce the Goods. According to the Statement of Essential Facts, the Commissioner is satisfied that there is an Australian industry producing like goods, comprising solely of Orrcon.² The Applicants have been in contact with Orrcon to determine if Orrcon can produce the Goods imported by the Applicants. Pillar contacted Orrcon on 19 August 2021, asking whether Orrcon can manufacture the Goods and Orrcon responded on 19 August 2021 with the following:

"We can only offer you this material as we don't have anything with such a light wall thickness like the one you are after

*PTC-16-1.2-MSGB-7320mm - MILD STEEL GALVABOND - \$1.89m+
PTC-16-1.2-SEMB-6100mm - SEMI BRIGHT - \$1.77m+."*

Please refer to attachment 4 for a copy of this email.

- 4.5 Even though the Commissioner is satisfied that the only producer of the Goods is Orrcon, Pillar contacted another potential manufacturer to see if they could produce the Goods, to be absolutely thorough. On 23 August 2021, Pillar emailed Australian Rollforming Manufacturers Pty Ltd (**ARM**). ARM responded on 23 August 2021 with the following:

"Thank you for the enquiry, unfortunately this is a product we are unable to manufacture".

Please refer to attachment 5 for a copy of this email.

- 4.6 Pillar has since contacted Orrcon again, this time by way of a letter on 3 September 2021, setting out the details of the Investigation and potential exemption, and asking for Orrcon's opinion. Orrcon responded to Pillar on 13 September 2021 with the following.

"Unfortunately the diameter to thickness ratio of these sections exceed the capability for the OSB mill to reliably manufacture. Orrcon Steel reserve's our right to object for any duty exemption application that details products that are within or are substitutional to existing products in Orrcon Steel's manufacturing capability.

Will be happy to provide feedback on the description of the goods for your duty exemption application and to avoid any unnecessary delays to your application. My expectation is that the description would include a thorough description of all aspects of the finished products, including but not limited to the: OD, wall thickness, finish, length of rod, packaging, labelling along with reference to any additional rod specification.

How did you get on with the mill in terms of manufacturing specification of the rod?"

² Statement of Essential Facts, page 10.

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Orrcon has confirmed that the Goods are outside of its manufacturing capability and considering the Commissioner is satisfied that there is an Australian industry producing like goods, comprising solely of Orrcon,³ and Orrcon cannot produce the Goods, we submit that an exemption is in order to be granted in this instance.

Please refer to attachment 6 for a copy of the letter, and attachment 7 for a copy of Orrcon's response to the letter.

- 4.7 On 28 September 2021, after Orrcon completed an extensive enquiry into the specification of the Goods (including the review of the diameter, wall thickness, finish, length, packaging and labelling of the Goods), Orrcon emailed Pillar stating the following:

"Orrcon will not object unreasonably to an application for duty exemption. I am happy to offer our support by providing you with feedback on your description of the goods as part of a duty exemption application".

Please refer to attachment 8 for a copy of this email trail.

Based on the above, it is clear that Orrcon (who the Commissioner is satisfied is the only producer of the Goods in Australia) is in full support of the Applicants' Application. We are of the view that if the Australian Industry is in support of the Application, there is no reason for the Application to be denied.

- 4.8 The Applicants would like to note that they were not aware of the Investigation. TMH was not aware of the Investigation until their most recent shipment in July 2021. Pillar was not aware of the Investigation until the week of the 16th of August when it was alerted by the ABF. It is the first time Pillar has been impacted by an Investigation of this nature. We are instructed that Pillar had a telephone conversation with Corey Hawke of the Anti-Dumping Commission on 18 August 2021, and Mr Hawke confirmed that Pillar was not contacted nor was Pillar's freight forwarder contacted in relation to making a submission for an exemption by the Anti-Dumping Commission when the Investigation began. Pillar was told by Mr Hawke that it should have been contacted by the Anti-Dumping Commission, and therefore given the opportunity to submit an exemption application. Mr Hawke advised that FFHP (the Chinese Manufacturer) was contacted. Unfortunately, FFHP did not contact either of the Applicants in relation to the Investigation. The Applicants advise that if they had been notified of the Investigation, they would have made appropriate arrangements to apply for an exemption at the outset.
- 4.9 In circumstances where the Goods are not like goods and the Australian industry has confirmed that it is not able to manufacture the Goods, we submit that the 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 and request that an exemption from the measures be granted in respect of the Goods.

³ Statement of Essential Facts, page 10.

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5 Conclusions

- 5.1 For the reasons set out above, the Applicants are of the view that the Goods which they have imported and continue to import are not Goods subject to the Investigation, as under paragraph 8(7)(a) and 10(8)(a) of the Anti-Dumping Act, like 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, and therefore the Applicants should be exempt from any dumping or countervailing duty otherwise payable on the Goods.
- 5.2 We would like to flag with the Anti-Dumping Commission that this exemption application is urgent, as the dumping and countervailing duty payable on the Goods have significant ramifications for the Applicants businesses both financially and commercially.

We would be pleased to provide the Anti-Dumping Commission with any further information it may require to consider this joint exemption application.

Yours faithfully



Andrew Hudson
Partner

**Attachments to Joint Application for exemption from dumping duty and
countervailing duty**

On behalf of
Pillar Products Pty Ltd
Taskmaster Hardware Australia Pty Ltd

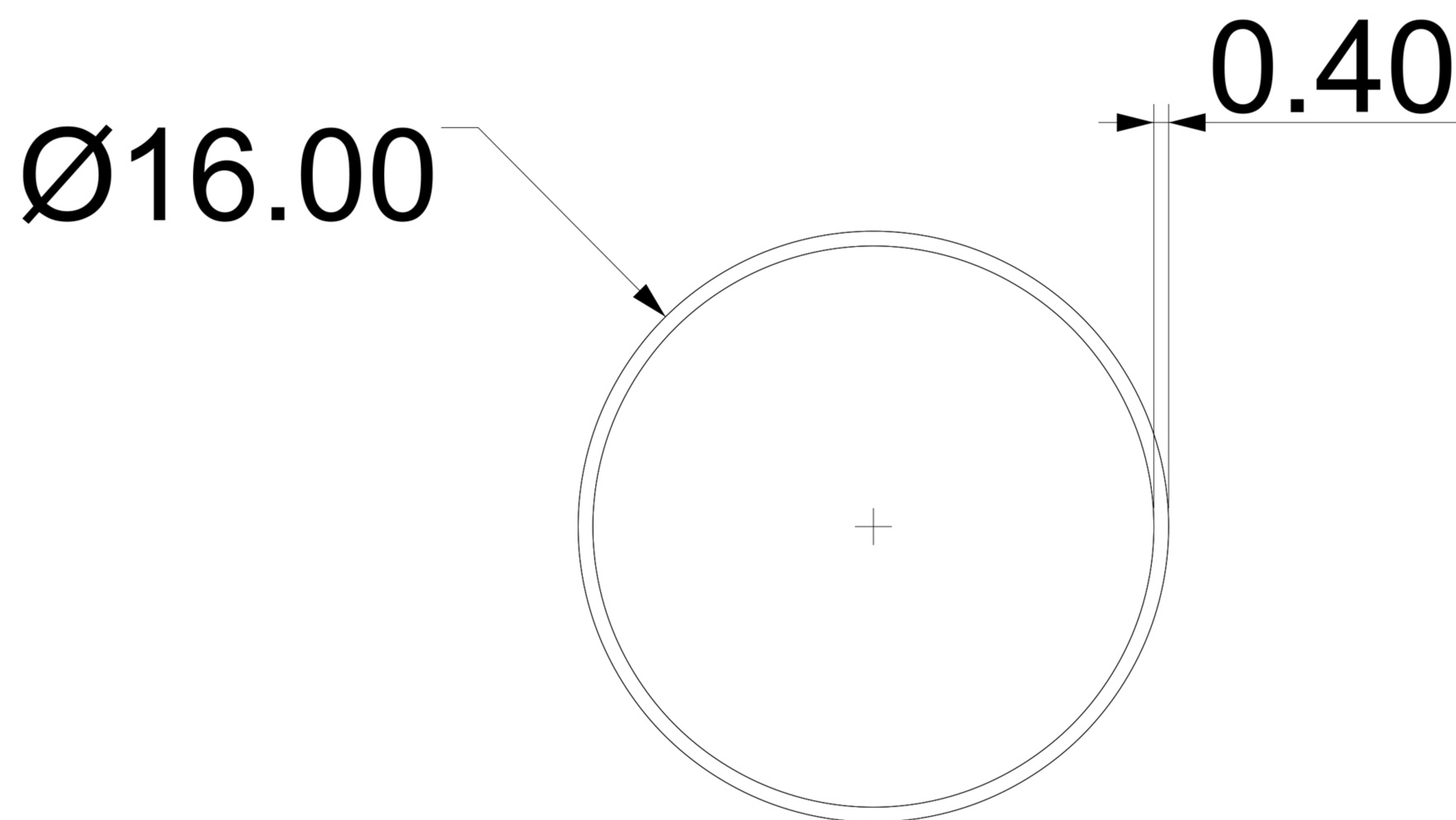
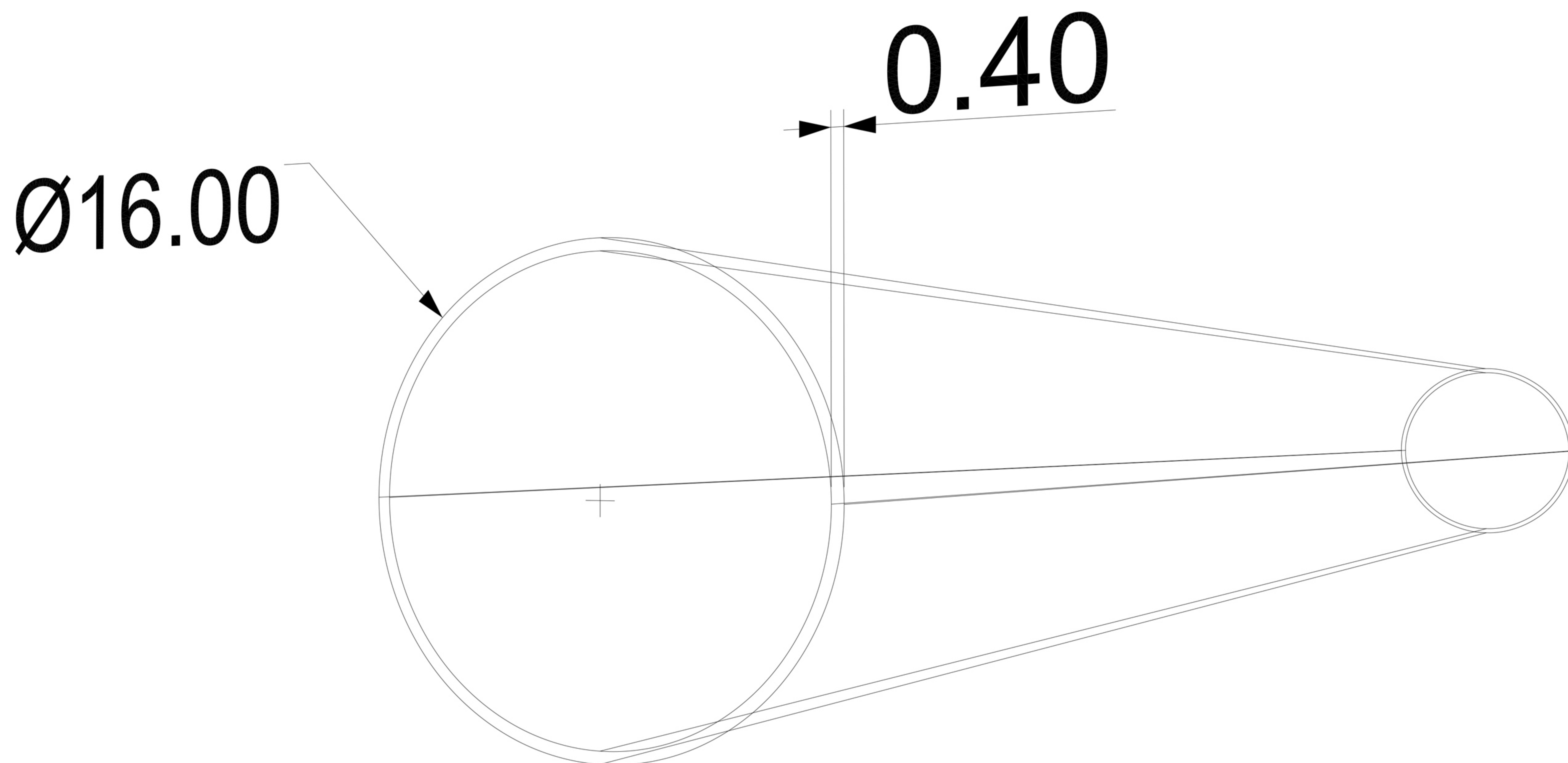
1. Photograph of a sample curtain rod



**Attachments to Joint Application for exemption from dumping duty and
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On behalf of
Pillar Products Pty Ltd
Taskmaster Hardware Australia Pty Ltd

2. Diagram of the curtain rod



Units of measurement :mm
Plus-minus tolerance:0.02mm

**Attachments to Joint Application for exemption from dumping duty and
countervailing duty**

On behalf of
Pillar Products Pty Ltd
Taskmaster Hardware Australia Pty Ltd

3. Email from Previous Australian Supplier

Holly Walker

From: Holly Walker
Sent: Friday, 17 September 2021 10:37 AM
To: Holly Walker
Subject: FW: Cease of manufacturing 16mm curtain rods

From: Scott Forrest <scottf@pillarproducts.com.au>
Sent: Tuesday, 24 August 2021 12:23 PM
To: Aaron Phipps <aaronp@pillarproducts.com.au>
Subject: FW: Cease of manufacturing 16mm curtain rods

----- Original message -----

From: Alex Piscitelli <alex@rollcraft.com.au>
Date: 22/3/21 10:41 (GMT+10:00)
To: 'Ian Jones Sales' <sales.ij@outlook.com>, 'Sales' <Sales@romak.com.au>, trackline2@bigpond.com, 'Daniel Petzer' <danielp@pillarproducts.com.au>, sonia@sanptyltd.com, messaging-service@post.xero.com, koolpelmet@bigpond.com, 'Remlap' <sales@remlap.net.au>, warehouseho.company@dollarcurtains.com.au
Subject: Cease of manufacturing 16mm curtain rods

Dear Customers,

Rollcraft will cease manufacturing of the 16mm curtain rods around 1/7/21.

This is mainly due to the reduction in volume by 65% over the last few years,

Orders will be processed in date order.

Rollcraft regrets making this business decision but cannot continue under the current circumstances.

There is a limited supply of steel, and when that is exhausted supply will cease.

Kind Regards,

Alex Piscitelli

Production Manager

Rollcraft PTY LTD

Factory 1/7 Webster Way, Pakenham VIC 3810

Telephone: 03 5941 6155

Mobile: 0400 650 568

Fax: 03 5941 6166

Email: alex@rollcraft.com.au

**Attachments to Joint Application for exemption from dumping duty and
countervailing duty**

On behalf of
Pillar Products Pty Ltd
Taskmaster Hardware Australia Pty Ltd

5. Email from ARM dated 23 August 2021

Holly Walker

From: Joe Soffici <jsoffici@ausrollform.com.au>
Sent: Monday, 23 August 2021 3:12 PM
To: Ricardo Rogers
Subject: RE: Australian Rollforming Manufacturers Contact form submission
Attachments: 16mm-Curtain-Rod-Ivory.jpg

Hi Ricardo,

Thank you for the enquiry, unfortunately this is a product we are unable to manufacture.

Best regards

Joe Soffici

17-23 Gaine Road Dandenong South, VIC 3175

t: +61 (03) 8799 7444 | f: +61 (03) 8768 7496 | m: +61 0419595706

e: jsoffici@ausrollform.com.au | enquiries: jsoffici@ausrollform.com.au

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From: Australian Rollforming <wordpress@ausrollform.com.au>
Sent: Monday, 23 August 2021 2:55 PM
To: ARM Info <info@ausrollform.com.au>
Subject: Australian Rollforming Manufacturers Contact form submission

From: Ricardo Rogers

Email Address: ricardor@pillarproducts.com.au

Phone: 0422810972

Message Body:

Good Afternoon,

I am enquiring about cold-rolled steel tubing/pipe to be used as Curtain Rods.

The product we're after is 16mm outside diameter in 0.4mm gauge/wall thickness in both powder-coated (White/Ivory/Black) and electroplated (Brushed Chrome).

Lengths are 1.5/2.0/2.5/3.0m, individually heat/shrink wrapped & labelled.

Additionally we would be looking into 21mm also.

Is this something you are able to produce?

Thanks and I look forward to your reply.

Uploaded File: https://ausrollform.com.au/wp-content/uploads/wp_dndcf7_uploads/wpcf7-files/16mm-Curtain-Rod-Ivory.jpg

Page: <https://ausrollform.com.au/contact/>

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This e-mail was sent from a contact form on Australian Rollforming Manufacturers
(<https://ausrollform.com.au>)

**Attachments to Joint Application for exemption from dumping duty and
countervailing duty**

On behalf of
Pillar Products Pty Ltd
Taskmaster Hardware Australia Pty Ltd

4. Email from Orrcon dated 19 August 2021

Holly Walker

From: Holly Walker
Sent: Friday, 17 September 2021 10:37 AM
To: Holly Walker
Subject: FW: QT -24291551 16mm Cold Rolled Steel Tube

From: SalesVic <salesvic1@orrcon.com.au>
Sent: Thursday, 19 August 2021 4:22 PM
To: Des Bankier <desb@pillarproducts.com.au>
Subject: RE: QT -24291551 16mm Cold Rolled Steel Tube

Good Afternoon Des

We can only offer you this material as we don't have anything with such a light wall thickness like the one you are after.

PTC-16-1.2-MSGB-7320mm - MILD STEEL GALVABOND - \$1.89m+

PTC-16-1.2-SEMB-6100mm - SEMI BRIGHT - \$1.77m+

Please ensure you address all Sales enquiries and orders to salesvic@orrcon.com.au

Kind Regards,

Steve Monk | Internal Sale

T: +61 3 9253 9686 | E: salesvic@orrcon.com.au

A: PO Box 1335 Clayton South Vic 3169 | Gate 1, 16-24 Westall Road, Clayton South Vic 3169



From: Anderson, Tegan <T.Anderson@Orrcon.com.au>
Sent: Thursday, 19 August 2021 12:31 PM
To: SalesVictoria <salesvic@orrcon.com.au>
Subject: FW: 16mm Cold Rolled Steel Tube

Please action and reply when complete

Kind Regards,

Tegan Anderson

National Customer Service Representative

T: 13 78 33 | F: 1300 884 214 | E: sales@13steel.com



From: Des Bankier <desb@pillarproducts.com.au>
Sent: Thursday, 19 August 2021 11:58 AM
To: Info Marketing E-mail <info@orrcon.com.au>
Cc: Ricardo Rogers <ricardor@pillarproducts.com.au>
Subject: 16mm Cold Rolled Steel Tube

Good Afternoon,

I am enquiring about cold-rolled steel tubing/pipe to be used as Curtain Rods.

The product we're after is 16mm outside diameter in 0.4mm gauge/wall thickness in both powder-coated (White/Ivory/Black) and electroplated (Brushed Chrome), please see images attached.
Lengths are 1.5/2.0/2.5/3.0m, individually heat/shrink wrapped & labelled.

Is this something Orrcon is able to produce?

Thanks and I look forward to your reply.

Regards

Des Bankier
Marketing Director

desb@pillarproducts.com.au
[+61412167646](tel:+61412167646)

Pillar Products Pty Ltd
48-50 Access Way, Carrum Downs VIC 3201
[1300 155 355](tel:1300155355)

PILLAR

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**Attachments to Joint Application for exemption from dumping duty and
countervailing duty**

On behalf of
Pillar Products Pty Ltd
Taskmaster Hardware Australia Pty Ltd

6. Letter from Pillar to Orrcon dated 3 September 2021



Pillar Products Pty Ltd
48-50 Access Way, Carrum Downs VIC 3201
1300 155 355

Orrcon Steel
PO Box 1335
Clayton South VIC 3169

To Whom It May Concern,

Des Bankier, my colleague and Product manager at Pillar, sent an email to you on the 19th August 2021 in relation to supplying cold-rolled steel tubing to be used as curtain rods. His correspondence is below.

*I am enquiring about cold-rolled steel tubing/pipe to be used as Curtain Rods.
The product we're after is 16mm outside diameter in 0.4mm gauge/wall thickness in both powder-coated (White/Ivory/Black) and electroplated (Brushed Chrome), please see images attached.
Lengths are 1.5/2.0/2.5/3.0m, individually heat/shrink wrapped & labelled.
Is this something Orrcon is able to produce?
Thanks and I look forward to your reply.*

Des supplied photos and dimensions of the products we are seeking. That same day we received a reply from your Vic sales department stating that you did not produce any material of such light wall thickness.

For your information, we have supplied this curtain rod product to the Australian DIY market through a local hardware chain for the last 7 years. Most of the range was sourced locally, until the start of 2021 when our local supplier ceased supply of 16mm rods. We subsequently had to source this from overseas and unfortunately, due to the classification of our rods under 7306.30.00, we have been caught under the anti-dumping regime - due to Reviews 529 & 550 brought by Orrcon.

We were never advised of these actions by the Anti-Dumping Commission (we are aware that we should have been advised when the reviews 529 & 550 first began) so never had an opportunity to present a case for exemption during the review processes.

Besides Orrcon, we have reached out to other local manufacturers to source the products and all have confirmed they do not produce these curtain rods. In order to continue to supply our customers we have no option but to seek an exemption from the duties imposed as a result of the recent cases.



Pillar Products Pty Ltd

48-50 Access Way, Carrum Downs VIC 3201

1300 155 355

Given that we do not compete in Orrcon's market, we produce no structural steel products only curtain rods, we are seeking Orrcon's opinion on our exemption application. We would hope that given our circumstances Orrcon would see no Issue with our application and in fact would support the exemption.

We look forward to a reply to this correspondence

Yours Sincerely,

Aaron Phipps
Operations Director

**Attachments to Joint Application for exemption from dumping duty and
countervailing duty**

On behalf of
Pillar Products Pty Ltd
Taskmaster Hardware Australia Pty Ltd

7. Response to Letter from Orrcon 13 September 2021

Holly Walker

From: Holly Walker
Sent: Wednesday, 15 September 2021 2:47 PM
To: Holly Walker
Subject: FW: Pillar Products Pty Ltd - Duty Exemption Application

From: Haynes, David <d.haynes@orrcon.com.au>
Sent: Monday, 13 September 2021 3:49 PM
To: Aaron Phipps <aaronp@pillarproducts.com.au>
Cc: Denny, Estelle <e.denny@orrcon.com.au>; Cousins, Marc <m.cousins@orrcon.com.au>; Scott Forrest <scottf@pillarproducts.com.au>; Ricardo Rogers <ricardor@pillarproducts.com.au>; Des Bankier <desb@pillarproducts.com.au>
Subject: RE: Pillar Products Pty Ltd - Duty Exemption Application

Hi Aaron,

I met with OSB mill team earlier today so can clarify further Orrcon Steel's position here. Unfortunately the diameter to thickness ratio of these sections exceed the capability for the OSB mill to reliably manufacture. Orrcon Steel reserve's our right to object for any duty exemption application that details products that are within or are substitutional to existing products in Orrcon Steel's manufacturing capability.

Will be happy to provide feedback on the description of the goods for your duty exemption application and to avoid any unnecessary delays to your application. My expectation is that the description would include a thorough description of all aspects of the finished products, including but not limited to the: OD, wall thickness, finish, length of rod, packaging, labelling along with reference to any additional rod specification.

How did you get on with the mill in terms of manufacturing specification of the rod?

Kind Regards,

David Haynes | Quality Manager

T: +61 7 3274 0687 | M: 0412 562 509 | E: d.haynes@orrcon.com.au

A: PO Box 295 Salisbury QLD 4107 | Building 3, 121 Evans Rd Salisbury QLD 4107

**Attachments to Joint Application for exemption from dumping duty and
countervailing duty**

On behalf of
Pillar Products Pty Ltd
Taskmaster Hardware Australia Pty Ltd

8. Email from Orrcon dated 28 September 2021

Holly Walker

From: Holly Walker
Sent: Tuesday, 28 September 2021 4:47 PM
To: Holly Walker
Subject: FW: Pillar Products Pty Ltd - Duty Exemption Application

From: Haynes, David <d.haynes@orrcon.com.au>
Sent: Tuesday, 28 September 2021 2:12 PM
To: Aaron Phipps <aaronp@pillarproducts.com.au>
Cc: Denny, Estelle <e.denny@orrcon.com.au>; Cousins, Marc <m.cousins@orrcon.com.au>; Scott Forrest <scottf@pillarproducts.com.au>; Ricardo Rogers <ricardor@pillarproducts.com.au>; Des Bankier <desb@pillarproducts.com.au>
Subject: RE: Pillar Products Pty Ltd - Duty Exemption Application

Hi Aaron,

Orrcon will not object unreasonably to an application for duty exemption. I am happy to offer our support by providing you with feedback on your description of the goods as part of a duty exemption application.

Kind Regards,

David Haynes | Quality Manager

T: +61 7 3274 0687 | M: 0412 562 509 | E: d.haynes@orrcon.com.au

A: PO Box 295 Salisbury QLD 4107 | Building 3, 121 Evans Rd Salisbury QLD 4107

From: Aaron Phipps <aaronp@pillarproducts.com.au>
Sent: Tuesday, 14 September 2021 7:57 PM
To: Haynes, David <d.haynes@orrcon.com.au>
Cc: Denny, Estelle <e.denny@orrcon.com.au>; Cousins, Marc <m.cousins@orrcon.com.au>; Scott Forrest <scottf@pillarproducts.com.au>; Ricardo Rogers <ricardor@pillarproducts.com.au>; Des Bankier <desb@pillarproducts.com.au>
Subject: RE: Pillar Products Pty Ltd - Duty Exemption Application

Hi David,

Please see attached some images of the goods themselves, showing how they are individually bar coded and packaged before sending to our warehouse. We receive them in carton qty's of 12's or 40's depending on size.

I have also received some other information from the factory. It is included below.

As discussed, we cannot source these rods locally (we have asked yourselves and other manufacturers). And we do not compete in any market with Orrcon. It is not a structural steel product. We supply the local DIY market.

We feel it is completely unfair to be penalised for sourcing the product where we can and would appreciate any support Orrcon could provide to our exemption application.

Let me know if any questions.

Regards

1.Type/Grade of metal used, carbon %
A Class Hot-Rolled Strips, Carbon 0.12%

2.Gauge/thickness (for 16/25/32mm)

16mm rod Thickness: 0.4mm

25mm rod thickness:0.5mm

32mm rod thickness:0.7mm

3.Rolling process/technique

Roll forming

4.Welding process/technique

Longitudinal welding

5.Coating/Plating techniques and materials

样品描述/Details of analytical sample(s)/ component(s):

1. 镀铬

序号 No.	测试项目 Test Item(s)	检验结果 T
1	铅 Lead(Pb)	
2	汞 Mercury(Hg)	
3	镉 Cadmium (Cd)	
4	六价铬 Hexavalent chromium (Cr ⁶⁺)	

说明/Note:

1. ND 表示“未检出”。ND = Not detected (ie.<MDL)

6.Shrink/Heat wrap packaging/labels

Shrink wrap

Aaron Phipps

Operations Director

aaronp@pillarproducts.com.au

[0418104438](tel:0418104438)

Pillar Products Pty Ltd

48-50 Access Way, Carrum Downs VIC 3201

[1300 155 355](tel:1300155355)

PILLAR

Follow us on    

From: Haynes, David <d.haynes@orrcon.com.au>
Sent: Monday, 13 September 2021 3:49 PM
To: Aaron Phipps <aaronp@pillarproducts.com.au>
Cc: Denny, Estelle <e.denny@orrcon.com.au>; Cousins, Marc <m.cousins@orrcon.com.au>; Scott Forrest <scottf@pillarproducts.com.au>; Ricardo Rogers <ricardor@pillarproducts.com.au>; Des Bankier <desb@pillarproducts.com.au>
Subject: RE: Pillar Products Pty Ltd - Duty Exemption Application

Hi Aaron,

I met with OSB mill team earlier today so can clarify further Orrcon Steel's position here. Unfortunately the diameter to thickness ratio of these sections exceed the capability for the OSB mill to reliably manufacture. Orrcon Steel reserve's our right to object for any duty exemption application that details products that are within or are substitutional to existing products in Orrcon Steel's manufacturing capability.

Will be happy to provide feedback on the description of the goods for your duty exemption application and to avoid any unnecessary delays to your application. My expectation is that the description would include a thorough description of all aspects of the finished products, including but not limited to the: OD, wall thickness, finish, length of rod, packaging, labelling along with reference to any additional rod specification.

How did you get on with the mill in terms of manufacturing specification of the rod?

Kind Regards,

David Haynes | Quality Manager

T: +61 7 3274 0687 | M: 0412 562 509 | E: d.haynes@orrcon.com.au

A: PO Box 295 Salisbury QLD 4107 | Building 3, 121 Evans Rd Salisbury QLD 4107

From: Aaron Phipps <aaronp@pillarproducts.com.au>
Sent: Monday, 13 September 2021 3:19 PM
To: Haynes, David <d.haynes@orrcon.com.au>
Cc: Denny, Estelle <e.denny@orrcon.com.au>; Cousins, Marc <m.cousins@orrcon.com.au>; Scott Forrest <scottf@pillarproducts.com.au>; Ricardo Rogers <ricardor@pillarproducts.com.au>; Des Bankier <desb@pillarproducts.com.au>
Subject: RE: Pillar Products Pty Ltd - Duty Exemption Application

Hi David,

Have you had any luck with the mill?

Was there any further information you require?

We have some tight timelines to adhere to, if the specs are not something Orrcon currently do or would realistically look at doing it would be appreciated if you could let us know.

Thanks for your attention, let us know if any questions.

Regards

Aaron Phipps
Operations Director

aaronp@pillarproducts.com.au

0418104438

Pillar Products Pty Ltd

48-50 Access Way, Carrum Downs VIC 3201

1300 155 355



Follow us on    

From: Aaron Phipps

Sent: Wednesday, 8 September 2021 2:27 PM

To: Haynes, David <d.haynes@orrcon.com.au>

Cc: Denny, Estelle <e.denny@orrcon.com.au>; Cousins, Marc <m.cousins@orrcon.com.au>; Scott Forrest <scottf@pillarproducts.com.au>; Ricardo Rogers <ricardor@pillarproducts.com.au>; Des Bankier <desb@pillarproducts.com.au>

Subject: RE: Pillar Products Pty Ltd - Duty Exemption Application

Hi David,

Thanks for taking my call.

As previously advised through the Vic sales team the products we are seeking fit the below specifications (we get them pre-packed and bar coded from China in 2m & 3m lengths)

- 16mm outside diameter in 0.4mm gauge/wall thickness powder-coated in White/Ivory/Black
- 25mm outside diameter in 0.5mm gauge/wall thickness in both powder-coated (White/Ivory/Black) and electroplated (Brushed Chrome).
- 32mm outside diameter in 0.7mm gauge/wall thickness in electroplated finish (Brushed Chrome).

What other technical specifications would you need? Or specific testing reports?

It would be great if you could get an indication from the mill about the realistic possibility of manufacture as we would be happy to see this done locally if it could work for both parties.

If it has potential we are happy to provide volumes etc.

Let me know if any questions.

Regards

Aaron Phipps

Operations Director

aaronp@pillarproducts.com.au

0418104438

Pillar Products Pty Ltd

48-50 Access Way, Carrum Downs VIC 3201

1300 155 355



Follow us on    

From: Haynes, David <d.haynes@orrcon.com.au>
Sent: Wednesday, 8 September 2021 10:55 AM
To: Aaron Phipps <aaronp@pillarproducts.com.au>
Cc: Denny, Estelle <e.denny@orrcon.com.au>; Cousins, Marc <m.cousins@orrcon.com.au>
Subject: Pillar Products Pty Ltd - Duty Exemption Application

Hi Aaron,

I was forwarded your letter by our National Customer Service team and I can assist you to confirm Orrcon Steels capability in terms of our Precision and Structural pipe and tube manufacturing capability and range.

Do you have a more complete specification of the tubular material used to manufacture the curtain rod products, along with a description of the imported curtain rod product that you are seeking to import?

If you would like to discuss further please feel free to call at your convenience.

Kind Regards,
David Haynes | Quality Manager

T: +61 7 3274 0687 | M: 0412 562 509 | E: d.haynes@orrcon.com.au
A: PO Box 295 Salisbury QLD 4107 | Building 3, 121 Evans Rd Salisbury QLD 4107



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