

25 March 2019

Ms Sangeeta D'Souza  
Assistant Director  
Investigations 2  
Anti-Dumping Commission  
Level 35, 55 Collins Street  
Melbourne Victoria 3000

### Public File

Dear Ms D'Souza

#### Investigation 501: Submissions by Vincent Buda and Company

I refer to the two submissions recently placed on the Electronic Public Record (EPR) No's 005 (dated 6 March 2019) and 006 (dated 15 March 2019) on behalf of the importer Vincent Buda and Company (Vincent Buda).

I. Submission dated 6 March 2019

This submission seeks to comment on the goods description and query the goods the subject of the application. It is asserted that Vincent Buda is unfamiliar with the term "solid base angles". Galintel Pty Ltd (Galintel) is a little perplexed by this remark as Galintel forwards Vincent Buda a price list on occasions that references this term. Please see attached Confidential Attachment 1.

The submission suggests that the goods the subject of the application are solid base angles made from hot rolled coil (HRC). It is clear from the application that the goods must also be "cold-rolled formed, whether or not galvanised".

It is queried by Vincent Buda whether the goods are limited to lintel applications only. Whilst Galintel supplies solid base angles for the use in lintel applications (as defined by the AS/NZ 4680:2006, with an R3 durability rating in accordance with AS/NZ 2699:2002, and load tested in accordance with AS/NZ 1170:2002. These parameters define the goods for use in lintel applications. Galintel, however, can supply solid base angle outside of the nominated AS/NZ standards.

The Vincent Buda submission refers to a local roll-former, Australian Rollforming Manufacturers Pty Ltd (ARM). Galintel does not encounter ARM as a supplier of solid base angle in the Australian market for lintels. As Galintel understands production by ARM involves goods that do not match the description of the goods under consideration. That is, the ARM good include:

- Duragal Profiles include Flat Bar, Angle & Channel sections. This product has a special surface protection coating applied called Magnelis coating that is a hot-dip zinc, aluminium and magnesium coating to a 200g/m<sup>2</sup>;

Equal Angles (EA) from 25mmx25mm to 100mmx100mm in thicknesses 2.5mm to 6mm & lengths 6.0, 7.5, 9.0 and 12.0metre based section size. These are flat faced angles and not profiled like Galintel;

- Unequal Angle (UA) from 50mmx75mm to 150mmx100mm in 6mm thickness and 9 and 12.0metre lengths. These are flat faced angles & not profiled like Galintel;

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- Channels from 75mmx40mm to 300mmx90mm in thicknesses 4mm to 6mm and lengths of 9.0 and 12.0 metre based on section size; and
  - Flats from 50mm to 300mm wide in thicknesses from 4mm to 6mm and lengths of 6 metres

Galintel products – are galvanized to an R3 standard per AS/NZ 2699:2002 (as distinct from zinc, aluminium and magnesium coating) and are of a greater thickness to the goods produced by ARM.

ARM is a special section metal (including mild steel) roll-forming company in the heavy sections sector. According to the Liberty Steel's (a distributor of this product) website, ARM's goods are *"Manufactured in Australia from German-made strip featuring the innovative Magnelis coating, DuraGal angles supplied by Liberty Metalcentre (formerly OneSteel Metalcentre) and made from galvanized steel provide superior strength and corrosion protection in the harshest of environments"*. The ARM goods are used in applications such as:

- Rail rolling stock components;
- Conveyor sections;
- Noise walls;
- Bridge decking; and
- Sheeting.

Galintel does not consider that the goods manufactured by ARM compete directly with solid base angles as described in the goods description of Galintel's application. ARM's goods are of significantly different dimensions and lengths (Galintel up to 4 metres, whereas ARM produces 12 metre lengths), possess a lighter coating than solid base angles manufactured by Galintel, and are sold in different applications than solid base angles manufactured by Galintel. Galintel's application is limited to the goods that match the goods description only.

## II. Submission dated 15 March 2019

The further submission on behalf of Vincent Buda refers to two further roll-forming companies (Telford Building Systems and Millform). Similarly, Galintel does not compete with either of these companies in the solid base angle market.

The submission refers to the "roll-forming capabilities" of both companies. The identified ranges for Telford's Building Systems are significantly lighter than solid base angle conforming the nominated AS/NZ Standards and are therefore not considered "like goods".

Galintel understands that Telford's Buildings Systems (Telford's) are providers of pre-engineered metal building systems. Markets supplied by Telford's include: Commercial, Industrial, Sheds and Garages.

Telford's manufactures the following products:

- Angles from 30mmx30mm to 75mmx75mm in thicknesses 1.9mm to 3.0mm in lengths 9.0 metres (it is understood by Galintel that this is a newly commissioned roll forming machine);
- Purlins including 'C' and 'Z' sections from 100mm to 400mm in 1.2mm to 3mm thickness;
- W-Strap, in three widths 7", 9" & 11" suitable for fencing, stock crates and trailers; and
- Cladding in corrugated and T-Clad.

All products are cold rolled from light gauge coil in most cases pre-galvanized and or painted. The angle product offered is light gauge and not used as lintels designed for support of brick and block.

Millform is a manufacturer and an engineering service business offering a wide range of cold rolled steel sections. Markets supplied by Millform include include pre-engineered buildings.

Millform manufactures the following products:

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- Angles from 30mmx30mm to 100mmx100mm in thicknesses 0.75mm to 2.4mm and lengths 4.8 and 6.0 metres;
  - Channels from 101-301mm wide x 63-88mm length in thicknesses 1.2mm to 2.4mm and various lengths;
  - Purlins including 'C', 'Z' and Top Hat Sections, Battens & Stud Sections; and
  - Facade Systems including Top Hat and Flashing Sections.

All products are cold rolled from light gauge coil particularly pre-galvanized. The angle product offered is again light gauge in differing lengths above those supplied by Galintel and not used as lintels designed for support of brick and block.

Telfords and Millform do not manufacture solid base angle sold into the lintel market in Australia. Galintel does not consider that the goods produced by these companies can be considered solid base angles meeting the description of the goods as defined in ADN 2019/24.

### III. Conclusions

Galintel acknowledges that ARM, Telfords and Millform are roll-form manufacturers in Australia. The goods manufactured by these companies, however, are not solid base angles sold into lintel applications as required by AS/NZ Standards 4680:2006, 2699:2002, and 1170:2002, and are therefore not like goods to the goods manufactured by Galintel.

If you have any questions concerning this submission, please do not hesitate to contact me on (02) 9707 5000.



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