



3 June 2024

The Director – Investigations
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

**Circumvention inquiry into steel rod in coil
exported from the Peoples Republic of China**

Dear Commissioner,

This submission is made by Tianjin Tiankang Metal Products Co. Ltd (“TKM”) in response to allegations by Infrabuild Pty Ltd (“Infrabuild”) of the occurrence of circumvention activity by exporters of steel rod in coils (“RIC”) exported from the Peoples Republic of China (“China”). In its application, Infrabuild alleges that Chinese exporters have circumvented the dumping duty notice through the slight modification and exportation of certain mesh sheets. TKM intends to fully cooperate with the Anti-Dumping Commission’s (the Commission) inquiry and request for information.

The primary purpose of this submission is to bring to the Commission’s earliest attention, the numerous flawed and misleading statements presented in Infrabuild’s application, which undermines the basis for the initiation of the circumvention inquiry. TKM urges the Commission to carefully consider the issues raised in this submission, and upon confirmation of the facts, terminate the inquiry as soon as practicable.

TKM intends addressing each of the factors outlined in subsection 48(3) of the *Customs (International Obligations) Regulation 2015*, which are used to determine whether the circumvention goods are slightly modified, however it is important to first understand the implications of Infrabuild’s request to amend the notice to include mesh sheets.

The Australian industry producing like goods to the original RIC is comprised solely of Infrabuild, being the only manufacturer of RIC in Australia. In its original application¹ for dumping duties, Infrabuild highlighted that RIC is ‘... a semi-finished intermediate feed material that is generally further processed by cold drawing through a die to produce a wire. Wire drawn from rod is used in a variety of applications across a range of sectors of the Australian economy including... reinforcing mesh manufacturing’.

TKM understands that Infrabuild sells RIC to numerous Australian manufacturers that process into cold drawn wire. Those manufacturers then further process the cold drawn

¹ EPR 301, Record no. 3, page 15.

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wire into reinforcing mesh sheets. Therefore, the Australian industry producing cold drawn wire and reinforcing mesh sheets is comprised of, but not limited to²:

- Infrabuild
- Mesh and Bar Pty Ltd
- Best Bar Pty Ltd
- Vicmesh Pty Ltd
- Neumann Steel
- Wire Industries
- Reomart
- Fero Reinforcing
- Meshcrete
- Bianco Reinforcing
- ARC The Australia Reinforcing Company
- Active Steel
- Reosteel

TKM also understands that whilst Infrabuild may be the largest manufacturer of mesh sheets in Australia, its production volume does not account for the majority of total Australian production of mesh sheets.

Given that Infrabuild and the Commission did not consider or find that locally produced cold drawn wire or reinforcing mesh sheets to be like goods in the original investigation, it is reasonable to conclude that:

- RIC, cold drawn wire and reinforcing mesh sheet are not identical and do not have characteristics closely resembling each other, and as such,
- production of RIC, cold drawn wire and reinforcing mesh represent different Australian industries producing different and distinct like goods.

The diagram below shows the three stages of production identified in Infrabuild's application that covers the original RIC, the intermediate cold drawn wire, and the final reinforcing mesh sheet. It also shows the separate Australian industries representing each of these three products.

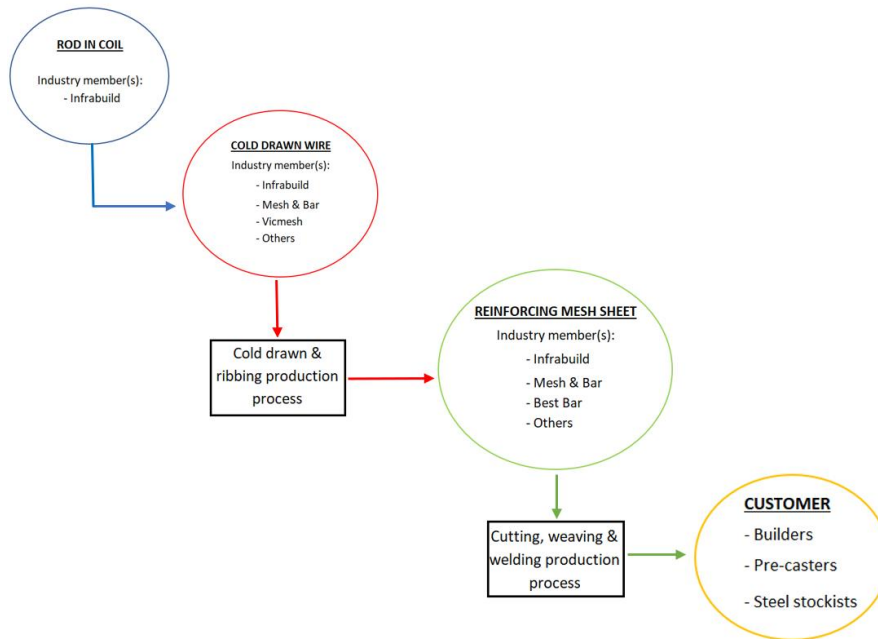
² [Steel certification - Steel Mesh to AS/NZS4671](#)

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Infrabuild now presents a conflicting view that the modification from RIC to mesh sheets is so slight, that they possess similar physical properties, end-use applications, production processes, production costs, distribution channels, pricing, and are interchangeable for each other. In effect, arguing that cold drawn wire and reinforcing mesh sheets are like goods to RIC.

In requesting for the original notice to be amended to include mesh sheets, Infrabuild is seeking to have the amended notice cover an expanded list of imported goods, for which there are multiple Australian industries producing multiple like goods. This is a blatant attempt by Infrabuild to seek to remedy alleged injury to the downstream reinforcing mesh industry, of which Infrabuild is a key member, without the need for the reinforcing mesh industry to demonstrate standing, provide any relevant cost and sales information to demonstrate injury, and demonstrate that the mesh sheets are in fact dumped.

If accepted by the Commission, this would set a seriously dangerous precedent for all existing measures that are themselves inputs into further processed goods, and that ultimately compete with other Australian downstream industries producing further processed like goods.

Consideration of 'slight modification'.

In assessing whether the circumvention goods have been slightly modified, TKM notes that the common definition of 'slight' is small in amount, quantity, degree, etc, and the ordinary definition of 'modify' is to make partial or minor changes. It is reasonable then to expect that a process that results in modification that is not minor or insubstantial, cannot be found to be a circumvention of the dumping duty notice.



To that end, it is relevant to note the Commission's own interpretation for determining whether a process of manufacture is 'substantial' for the purposes of establishing whether like goods are manufactured in Australia. The Commission's Dumping & Subsidy Manual provides:

To be substantial, that process must add some essential or vital quality or character to the finished product of like goods. The conversion of intermediate goods into final goods by virtue of a simple process such as dividing, sorting, simple assembly, packaging or labelling may not be regarded as substantial.

The Commission has in previous cases also had regard to subsection 269D(3) of the *Customs Act 1901*, which is concerned with the meaning of substantial process of manufacture for purposes of tariff concession orders. It states:

(3) Without limiting the meaning of the expression substantial process in the manufacture of the goods, any of the following operations or any combination of those operations does not constitute such a process:

- (a) operations to preserve goods during transportation or storage;*
- (b) operations to improve the packing or labelling or marketable quality of goods;*
- (c) operations to prepare goods for shipment;*
- (d) simple assembly operations;*
- (e) operations to mix goods where the resulting product does not have different properties from those of the goods that have been mixed.*

Finally, TKM notes that the European Union's interpretation of slight modification in the context of allegations of circumvention, similarly focuses on whether the modification in question, alters the essential characteristics of the goods.

It is clear then that a modification that changes or adds an essential characteristic, quality or property, is a substantial process, and such modifications cannot be considered to be slight or minor.

Relevant factors for comparison

Subsection 48(3) of the *Customs (International Obligations) Regulation 2015* sets out a non-exhaustive list of relevant factors to be considered by comparing the goods subject to the notice with the alleged circumvention goods.

- a) Each good's general physical characteristics.

In its application, Infrabuild presents a comparison of the physical characteristics between the circumvention goods and original subject goods. Its comparison is limited to four rudimentary criteria, whilst overlooking the key features that provide the goods with their essential characteristics. Strangely, Infrabuild has elevated the importance of the colour of



steel above the mechanical properties that ensure their compliance to the relevant Australian Standard and end use applications.

The table below provides an overview of the key characteristics missing from Infrabuild's comparison. It is critical that the Commission understand that RIC is manufactured with low yield strength, low tensile strength, and high elongation at maximum load. By contrast, the cold drawing process undertaken by TKM, produces ribbed wire with transformed mechanical properties including high yield strength, high tensile strength and low elongation at maximum load.

Physical characteristic	Goods (subject to measures)	Cold drawn ribbed wire (intermediate good)	Circumvention goods
Mechanical properties			
- Yield strength	> 235 Mpa	500 - 650 Mpa	500 - 650 Mpa
- Tensile strength	> 300 Mpa	> 550 Mpa	> 550 Mpa
- Elongation (Ductility)	Minimum 25%	Minimum 2%	Minimum 2%
Profile	round smooth finish	Circular and ribbed	Square/rectangular mesh
Australian standard	Not applicable	AS/NZ 4671 : 500L	AS/NZ 4671 : 500L

Importantly, the Australian Standard (AS/NZ 4671) requires concrete reinforcing steel to have the necessary mechanical properties (strength and ductility) appropriate to the engineering design assumptions on which they are based. Therefore, the highlighted differences in strength and ductility between RIC and the circumvention goods is decisive, given that RIC does not comply with the physical specification requirements of AS/NZ 4671, and as such, cannot be used for the purposes of reinforcing concrete.

A further key difference in physical features between the RIC and mesh sheets, is the change in profile during the two intermediate conversion processes. TKM purchases RIC that have a smooth round finish with no markings and are bundled in coils. During the cold drawing process, the wire is ribbed and unique markings are added to identify the manufacturer, in accordance with AS/NZ 4671.

The ribbed wire is then straightened and cut to required lengths, before inserting into a machine which welds the ribbed wire into a mesh formation. This process results in a substantial change in profile, with the mesh complying with the geometric properties outlined in AS/NZ 4671. Those geometric properties are a key element of the required performance of the mesh in concrete construction.

By contrast, Infrabuild's application misleads the Commission by suggesting that the physical characteristics are identical except for minor differences in dimensions, and form (coil vs sheet).



It is clear that the cold drawing process and mesh welding process alters the mechanical and geometric properties of the RIC, and provides the mesh sheets with the essential characteristics required by AS/NZ 4671 for use in reinforcing of concrete constructions.

b) Each good's end use.

As noted by Infrabuild, RIC is used as feedstock for further processing by cold drawing through a die to produce wire. The wire can then be further processed by various industries to manufacture finished goods used in numerous applications such as screws, bolts, nails, mesh and other reinforcing elements. Essentially, RIC's end use is limited to feedstock material for drawing of wire.

By contrast, the alleged circumvention goods are the finished reinforcing mesh sheets which are manufactured to comply with AS/NZ 4671 (Grade 500L), being for use in reinforcing concrete structures.

Importantly, RIC cannot be used as a reinforcing element in concrete structures, given that it does not hold the necessary mechanical and geometric properties of steel mandated by the Australian Standard. Likewise, the circumvention goods cannot be used as feedstock for drawing of wire given it is ribbed, weaved and welded into large sheets.

It is clear then that the cold drawing process and mesh welding process alters the mechanical and geometric properties of the RIC, such that the end use applications for RIC and mesh sheets are distinct and do not intersect.

c) Interchangeability of each good.

As highlighted above, the circumvention goods are manufactured to comply with the chemical, mechanical and geometric properties specified in AS/NZ 4671 (Grade 500L). RIC does not meet the specification requirements outlined in AS/NA 4671, given the:

- non-complying yield strength
- non-complying tensile strength
- non-complying ductility
- non-complying ribbing
- non-complying identification of the steel producer, and
- non-complying geometric profile

It is clear then that the cold drawing process and mesh welding process alters the mechanical and geometric properties of the RIC, such that the end use applications for RIC and mesh sheets are distinct and do not intersect.

Therefore, RIC and the circumvention goods are not interchangeable in any way, and it is the processing performed by TKM which alters the characteristics of RIC to the mesh sheets complying with AS/NZ 4671.

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d) Differences in the processes used to produce each good.

As TKM does not manufacture RIC, it has no direct comparison of the production processes for each good. However, it is common knowledge that RIC is produced from steel billet which is heated and rolled to reduced sizes, before forming into coils. By contrast, the mesh sheets undergo a number of processing stages which are important to defining its essential characteristics.

First, RIC is cold drawn and spools of ribbed or indented wire is produced. This step of the process is integral as the cold working process, through either cold drawing or cold rolling, results in work hardening. This process increases the yield and tensile strength, and reduces the ductility of the steel. In TKM's operations, the spools of cold drawn wire are fed into a straight and cut machine to produce straight lengths of cold drawn wire as per the customer's requirements. This straightening process results in some mechanical stress relieving, which can improve the ductility of the steel. The straightened and cut to length wire are then fed into a welding machine where each cross wire is welded to the longitudinal wires using electric resistance welding.

TKM reiterates that the cold drawing and mesh welding processes are substantial and essential procedures for converting the mechanical and geometric properties of the RIC into mesh sheets, to ensure compliance with AS/NZ 4671.

e) Differences in the cost to produce each good.

As TKM does not produce RIC in its manufacturing operation, it is not able to comment on those specific production costs. However, TKM does purchase RIC as its feedstock for manufacturing cold drawn wire and mesh sheets. Please refer to the response below regarding the cost of producing cold drawn wire and mesh sheets for further details of the additional cost of producing mesh sheets.

f) Cost of modification.

Based on its manufacturing operations, TKM's initial quick estimates of the conversion costs are:

1. RIC to cold drawn wire: approximately US\$ [REDACTED] per metric tonne; and
2. Cold drawn wire to mesh sheet: approximately US\$ [REDACTED] per metric tonne (MT).

Based on current prices for RIC of US\$ [REDACTED] / MT, the total manufacturing (conversion) cost of mesh sheets of US\$ [REDACTED] / MT, represents approximately [REDACTED]% of the total cost of the finished goods. This is a substantial conversion cost by any reasonable measures, and refutes Infrabuild's claim that the conversion cost '*... is a minor amount*'.

g) Customer preferences and expectations relating to each good.

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In its application, Infrabuild has addressed customer preferences and expectations from the perspective of the 'final end user customer', which presumably are the builders and pre-casters in its diagram at figure 2.2.9. It seeks to compare those builders and pre-casters purchasing manufactured mesh produced from imported RIC, and imported reinforcing mesh.

This is a misleading attempt by Infrabuild to overlook the key differences between the customers of RIC and mesh sheets. Nevertheless, it does highlight that the end users cannot be customers of RIC given that they do not possess the capabilities to further process and convert into mesh sheets.

The relevant assessment to be considered in the context of the circumvention inquiry is a comparison of the preferences and expectations of the customers purchasing the original RIC and the alleged circumvented mesh sheets.

First, it is important to note that there is a distinct difference in the type of customer seeking to purchase imported RIC and imported mesh sheet. As noted above, RIC is used almost exclusively as feedstock for cold drawn wire manufacturing, so the customers of RIC in Australia are the local mesh manufacturers such as Mesh and Bar, Best Bar, etc. These customers of RIC are the same level of trade as TKM, in that they purchase RIC for conversion to cold drawn wire and then reinforcing mesh sheets, to comply with AS/NZ 4671.

These mesh manufacturers will then sell the mesh sheets either directly to builders and/or pre-casters, or to smaller steel stockists/distributors which will supply builders. In the case of TKM's exports, it is understood that the importing traders will on-sell the mesh sheets directly to the steel distributors.

Therefore, the customers preferences will be vastly different between the mesh manufacturers purchasing RIC, and the steel distributors purchasing mesh sheets. The mesh manufacturers will require low grade RIC with the required yield strength, tensile strength and elongation, to work effectively on their individual cold drawing machines. Customers of RIC have no expectations or preferences for the goods complying with an Australian Standard or produced by ACRS accredited mills, as neither are relevant to RIC.

By contrast, the steel distributors stock and sell the finished goods directly to builders for use in concrete construction, so their preferences will focus almost exclusively on:

- whether the goods comply with AS/NZ 4671, being the mechanical and geometric qualities;
- whether the mill manufacturing the mesh sheets is accredited by the Australasian Certification Authority for Reinforcing and Structural Steels (ACRS), as the ACRS



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certificate gives a level of quality assurance for compliance to AS/NZS 4671 for steel manufacture and processing, over and above that provided by a Steel Mill certificate.

The preference of steel distributors for goods that comply with AS/NZ 4671 and manufactured by a mill with ACRS certification, confirms that the manufacturing processes undertaken by TKM alter the properties of the RIC, and results in mesh sheets with characteristics that are essential for meeting customers' requirements.

h) Way in which each good is marketed.

There are clear and distinct differences in the way both RIC and mesh sheets are marketed. As noted earlier, cold drawn ribbed wire and mesh sheets are subject to AS/NZ 4671. It is also the case that customers of mesh sheets have a strong preference for goods supplied by mills with ACRS certification. These are critical factors in the marketing of mesh sheets to customers in the Australian market.

This is evident in Infrabuild's own marketing material of its mesh manufacturing operations³, where it highlights the mill's capabilities and quality by referencing ACRS certification and compliance to AS/NZ 4671. The table below shows a comparison of the relevant standards and certification necessary for sales to customers in the Australian market.

Physical characteristic	Goods (subject to measures)	Cold drawn ribbed wire (intermediate good)	Circumvention goods
Australian standard	Not applicable	AS/NZ 4671 : 500L	AS/NZ 4671 : 500L
Third Party Certification	Not applicable	ACRS certified	ACRS certified

It is important to note that no such third-party certification or compliance to an Australian Standard applies to RIC, and that ACRS certification is not interchangeable across products. So that Infrabuild's ACRS certification of its mesh manufactured sheets does not certify its cold drawn wire or its RIC products. Each product is considered distinct and must be certified individually.

i) Channels of trade and distribution for each good.

As noted earlier, TKM understands that importing traders will on-sell the imported mesh sheets directly to steel distributors and not to local mesh manufacturers, which require RIC for further processing. Therefore, Infrabuild's diagram at Figure 2.2.9 of its application, incorrectly depicts the mesh sheets being sold directly to either the mesh manufacturers or the builders/pre-casters.

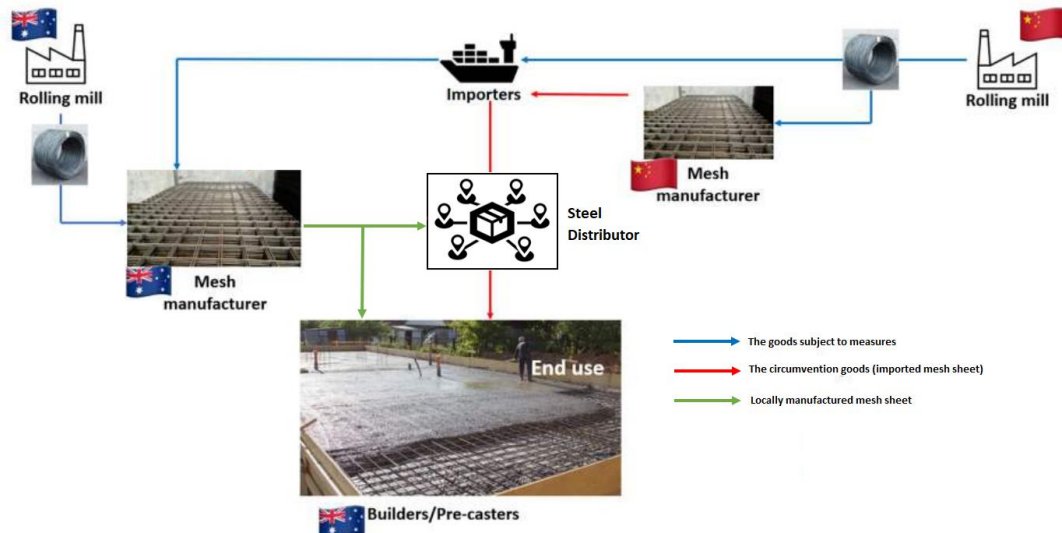
³ [Infrabuild mesh manufacturing](#)

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The diagram below includes an update of Infrabuild's original diagram with the inclusion of steel distributors, which source mesh sheets from either the local mesh manufacturers or importing traders.



Again, the processing undertaken by TKM results in a substantial alteration of the essential characteristics from the RIC to reinforcing mesh. This substantial modification results in a change to the distribution channels, given that mesh manufacturers require low grade, low strength and high elongation RIC, whereas steel distributors stock and sell the finished reinforcing mesh directly to builders.

Importantly, the sales and distribution of mesh sheets via steel distributors is long standing in the Australian market, providing a legitimate and commercial channel to market.

j) Patterns of trade for each good.

Infrabuild asserts that export of mesh sheets '*... have practically entirely displaced the goods, which indicates a high degree of interchangeability between each good, i.e. a customer can purchase either the goods to manufacture the circumvention goods or purchase the circumvention goods.*' This is incorrect on a number of levels.

TKM commenced exporting mesh sheets in [REDACTED], [REDACTED] years prior to the imposition of interim dumping duties on RIC. Infrabuild's graph at figure 2.2.1 of its application confirms that mesh sheets have been present in the Australian market for at least the past decade. It also confirms that RIC imports only occurred between 2014 to 2016, with irregular volumes across that period.

Second, the import data does not support a view that mesh sheet imports have displaced RIC imports. As highlighted throughout this submission, mesh manufacturers in Australia can only use RIC as feedstock on their cold drawing lines and mesh machines. There is no



scope for mesh manufacturers to interchange between RIC and mesh sheets. Likewise, the steel distributors that are the customers of mesh sheet imports, have no scope to interchange between RIC and mesh given they do not have the equipment for processing of the RIC into reinforcing mesh products.

Instead, the import data suggests that steel distributors have been sourcing mesh sheets from China for at least a decade, and for a short 3-year period, Australian mesh manufacturers sought to supplement their supply of local RIC with imported RIC for production of reinforcing mesh products. The cessation of RIC imports in 2016, which coincides with the imposition of measures, suggests that the Australian mesh manufacturers either switched to alternative export markets, or returned to sourcing entirely from Infrabuild.

In fact, the notion that Australian mesh manufacturers had switched to alternative export markets was a claim presented by Infrabuild in its RIC application against imports from Indonesia, Korea and Vietnam. In that application Infrabuild observed⁴:

It is obvious from Figure A-9.1.1 (below) that following the initiation of Dumping Investigation No. 240 (10 April 2014), the volumes of dumped imports from China began to grow (indicated here as the majority of 'other imports'), until Dumping Investigation No. 301 was initiated (12 August 2015), at which time, volumes of dumped imports from China began to decline, and the dumped imports from the countries nominated in this application began to grow quarter-on-quarter from July 2015.

Infrabuild adds⁵:

In other words, the above analysis supports the applicant's view that the dumped imports from the nominated countries were the price setters in the Australian domestic market for the goods during the proposed investigation period, and as such were the relevant source of injury to the applicant.

It is clear from Infrabuild's own observations of actual price offers and actual import volumes, that the cessation of Chinese imports of RIC was replaced by a notable and 'injurious' increase in RIC imports from Indonesia, Korea and Vietnam. It is disingenuous for Infrabuild to now be suggesting that the cessation of Chinese imports of RIC was the result of mesh manufacturers switching to imports of Chinese mesh sheets, when those products were present in the Australian market prior to the RIC dumping investigation being initiated.

k) Changes in the pricing of each good.

⁴ EPR 416, Record no. 1, page 37.

⁵ Ibid, page 58.



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As TKM is unaware of prices offered for exports of RIC to Australia, it cannot provide a direct comparison with its own export prices for mesh sheets. However, TKM purchases RIC locally and can compare those prices with its export prices for the finished mesh.

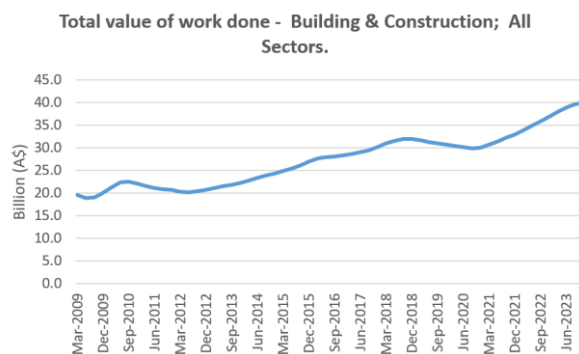
Based on an average purchase price of RIC of US\$ [REDACTED]/mt, TKM estimates that its FOB export price for reinforcing mesh to be approximately US\$ [REDACTED]/mt. This reflects a [REDACTED]% premium for the mesh sheet over the RIC feedstock. This refutes Infrabuild's assertion that reinforcing mesh attracts only 'a very small premium'.

Instead, it confirms the substantial process of manufacture undertaken by TKM to convert the mechanical and geometric properties of RIC.

From available market intelligence, TKM also understands that the price for Infrabuild's reinforcing mesh attracts a similar premium in the Australian market. This is based on prevailing RIC prices of approximately A\$ [REDACTED]/mt, and an average price of A\$ [REDACTED]/mt for reinforcing mesh.

1) Changes in the export volumes for each good.

TKM commenced manufacturing cold drawn wire and mesh sheets in [REDACTED]. Its first exports of mesh sheet to Australia occurred in [REDACTED], being [REDACTED] years prior to the imposition of measures in 2016. Since then, export volumes have steadily increased, in line with the growth of the Australian steel market, which in turn is driven by the growth in value of Australia's building and construction sectors. The graph below shows the increase in value of the building and construction sectors in Australia since 2009.



As noted above, TKM commenced exports of mesh sheet to Australia in [REDACTED], well before dumping duties were imposed on RIC. This confirms that the imposition of measures in 2016 was not a trigger for TKM to commence exporting to Australia. TKM had commenced making legitimate commercial sales to Australia years prior. This is relevant given the Anti-Dumping Review Panel's (ADRP) explanation that "[T]he purpose of the relevant CIO

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Regulation is to prevent exporters avoiding the imposition of measures under the Act by means of arrangements or conduct which are artificial or do not have legitimate commercial justification.”⁶

Given that TKM made legitimate commercial sales of mesh sheets years prior to the imposition of measures on RIC, it is unreasonable to claim that the continuation of exports of mesh sheet after the introduction of dumping duties, ought to be considered artificial or have no commercial justification.

m) Tariff classifications and statistical codes for each good.

The table below outlines the correct tariff classification for the original RIC, further processed cold drawn ribbed wire, and the finished mesh sheets. Importantly, the mesh sheets fall within a different chapter of the tariff schedule than the RIC.

Product	Tariff description	Tariff Classification
Rod in coil	Bars and rods, Hot-Rolled, in irregularly wound coils, of iron or non-alloy steel: -- Of circular cross-section measuring less than 14 mm in diameter	7213.91.00 (statistical code 44)
	Bars and rods, Hot-Rolled, in irregularly wound coils, of other alloy steel: -- Of circular cross-section measuring less than 14 mm in diameter	7227.90.90 (Statistical code 02)
Cold drawn ribbed wire	Other bars and rods of iron or non-alloy steel: - Other, not further worked than cold-formed or coldfinished: --Other	7215.50.90 (Statistical code 54)
	Other bars and rods of iron or non-alloy steel: - Other	7215.90.90 (Statistical code 55)
Mesh sheets	Cloth (including endless bands), grill, netting and fencing of iron or steel wire; expanded metal of iron or steel: -- Grill, netting and fencing, welded at the intersection, of wire with a maximum cross-sectional dimension of 3 mm or more and having a mesh size of 100 cm ² or more	7314.20.00 (Statistical code 24)

⁶ ADRP Report No. 37, para 42