

19 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 Director

I write in regard to Infrabuild's allegations that reinforcing mesh (RM) is slightly modified wire rod (RIC).

I find their allegations quite amusing and at best creative.

To say that RM is slightly modified RIC is hard to fathom for the following reasons.

1. To change from RIC to RM the product passes through another product form, Cold Drawn Wire, which has a different tariff classification to both RIC and RM, being 7217.10.00. This product isn't imported in large volumes from China.
2. Infrabuild say that RIC is the same as RM and has the same use, if that's the case Infrabuild should provide evidence of same.
 - Infrabuild should provide evidence of RIC being used as concrete reinforcing.
 - Infrabuild to provide evidence of an Australian engineer specifically specifying the use of RIC as concrete reinforcing.
 - Infrabuild to provide a copy of the Australian standard that covers RIC as a concrete reinforcing product.
3. RIC is generally supplied to an international standard (eg SAE 1018 grade, the same as Infrabuild imported from Hoa Phat Group, Vietnam in Oct 2023) while RM is supplied to an Australian standard AS/NZS 4671:2019.
4. The Australian Certification Authority for Reinforcing and Structural Steels Ltd (ACRS) under their certificate scheme issue a certificate for RM, but hasn't one for RIC. ACRS mesh certificate attached by example.
5. All construction works including Federal/State/Local Government infrastructure works in Australia require ACRS certified steel to be used, including RM. Therefore no one would use RIC as a "slightly modified" substitute to reinforce concrete. Maybe the Romans would have, but not these days.
6. Infrabuild refer to cheaper labour rates in China but also say the goods have been slightly modified. If the goods are only slightly modified then it would be logical to assume there would

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not be much labour required, and hence the cost referred to would not be an issue. Infrabuild need to pick which argument they want to put forth, as they can't have both.

RIC is a hot rolled product that has been formed from billet, RM is a cold rolled product as it has been cold rolled/drawn then straightened then welded. The companies who were buying the RIC prior to the dumping action nearly 10 years ago had cold rolling lines that converted the RIC to wire for their own mesh production. They are now sourcing RIC either from Infrabuild/Liberty or importing from other countries. The companies that are importing mesh now are different, they don't have wire drawing lines and have a different channel to market and are generally smaller entities.

Regarding importing RIC, Infrabuild themselves are having to import to supplement their own production/shortfalls. They may even need to increase this since the Liberty blast furnace in Whyalla is having issues making steel and Infrabuild is having supply issues with their own wire products and DBIC.

I would expect the fact that Infrabuild are facing product shortages would create inflationary pressures on steel prices and thereby drive construction costs and house prices up even more. Imports are needed to keep supply constant to the building industry, and especially so with Infrabuild's production and supply problems.

I noticed another submission from a building company that was named by Infrabuild and who in turn denied they ever imported RM from China. This calls into question the veracity of Infrabuild's data when they can make this type of error.

In summary, Infrabuild's claim that RM is slightly modified RIC would be believable if in fact the goods had similar usage. As mentioned above Infrabuild should be made to provide visual evidence of the same and supported by an engineer specifying RIC to be used as concrete reinforcement.

Regards,



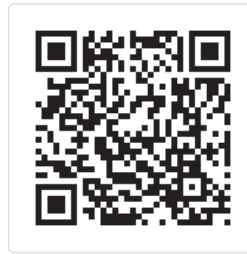
Steven Croft

Managing Director

2024

VALID TO 31 Dec

Australasian Certification Authority for
Reinforcing and Structural Steels Ltd



PRODUCT CERTIFICATION
www.steelcertification.com

CERTIFICATE OF APPROVAL

Product Conformity Certification

This is to certify that

Infrabuild

at

234 Bradman St

Acacia Ridge Qld Australia 4110

has satisfied the Authority that it complies with the rules of the ACRS Product Certification Scheme and the relevant ACRS Quality and Operations Assessment Procedures. Where appropriate, and as listed below, it has further satisfied the Authority that it manufactures and/or supplies products that conform with the Standards listed below, and is entitled to use the ACRS mark in relation to the products listed on this certificate.



SCOPE OF CERTIFICATION

Steel Reinforcing Mesh Manufacture to AS/NZS 4671:2019

Mesh approved on this certificate is certified only if manufactured from ACRS approved wire or bar. For approval of wire or bar, please refer to the manufacturer's ACRS certificate.

This certificate remains the property of the Authority and is issued subject to the Regulations of the Authority.

CERTIFICATE NUMBER	VERSION	FIRST APPROVAL	ISSUE DATE	EXPIRY DATE
31106	2	01 November 2003	01 January 2024	31 December 2024

SIGNED FOR ACRS

Andrew Wheeler,

Executive Director

AUSTRALASIAN CERTIFICATION AUTHORITY FOR REINFORCING AND STRUCTURAL
STEELS LTD | ABN: 40 096 692 545 | PO BOX 1369, CROWS NEST NSW 1585, AUSTRALIA

To check the validity of this certificate please scan the above Static QR Code with the ACRS
Cloud App or visit www.steelcertification.com

Cert. Ref.: 002-01 31106

This document is uncontrolled when printed View original at www.steelcertification.com

JAS-ANZ



www.jas-anz.org/register
Accreditation certificate
number Z5221212AC

2024

VALID TO 31 Dec

Australasian Certification Authority for
Reinforcing and Structural Steels Ltd



PRODUCT CERTIFICATION
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CERTIFICATE OF APPROVAL

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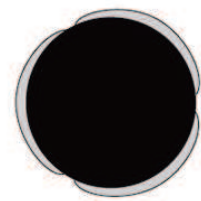
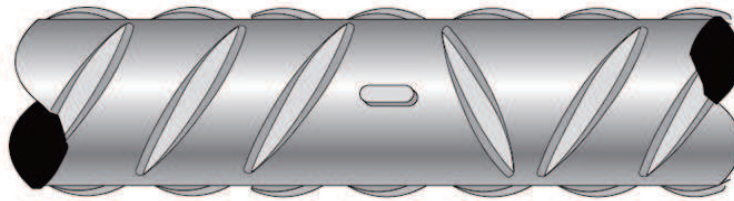
Products assessed by ACRS to the following Standards:

AS/NZS 4671 Grade 500L Mesh

- Square Mesh SL62, SL72, SL81, SL82, SL92, SL102
- Rectangular Mesh RL718, RL818, RL918, RL1018
- Trench Mesh L8TM, L11TM, L12TM

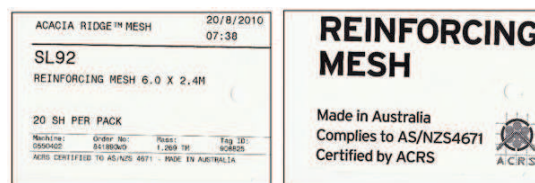
Approved Company Information

Bar Markings



Acacia Ridge

Tag



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