

25 September 2024

Anti-Dumping Commission
Investigations
GPO Box 1632
Melbourne VIC 3001

Email: investigations@adcommission.gov.au

Public File

Dear Director,

Investigation No. 653 concerning Ceiling Steel Framing Members from China

The member of the Australian industry producing like goods to the goods the subject of this inquiry, Rondo Building Services Pty Limited (**Rondo**) provides the following submission in relation to the above-noted inquiry.

1. Grounds for the imposition of provisional measures

In its application for measures, Rondo alleged that it has suffered material injury from dumped and subsidised Chinese exports of Ceiling Steel Framing Members (**CSFMs**) in the following forms:

- lost sales volume/market share;
- lower production volumes;
- price suppression;
- price depression;
- loss of profits;
- loss of profitability;
- decline in asset values;
- reduced capital investment;
- reduced return on investment;
- reduced capacity utilisation; and
- reduced productivity.

In its consideration report to this inquiry, the Anti-Dumping Commission (**the Commission**) has determined that there appears to be reasonable grounds to support these material injury claims.¹

¹ Consideration Report No. 653, p. 25.

The Commission has also assessed that there appears to be reasonable grounds that Chinese dumping margins are above negligible levels, with the Commission's estimate from the consideration report standing at 99.2 percent (as compared to Rondo's prima facie application estimate of 56 – 68 percent).²

On subsidisation, the Commission has noted that there exist reasonable grounds for the claim made by Rondo that countervailable subsidies have been received in respect of exports of CSFMs from China.³

On the basis of this initial injury assessment and substantial margins of dumping, Rondo requests that the Commission apply provisional measures, including the taking of securities under section 42.⁴ Rondo submits that a Preliminary Affirmative Determination (**PAD**) at day 60 is required to prevent ongoing material injury to the Australian industry occurring while the investigation continues.⁵

To further substantiate the ongoing incurrence of material injury, in all the above forms, from dumped and subsidised Chinese CSFM exports, Rondo provides at Confidential Attachment 1 recent examples of Chinese CSFM price offers which have undercut the Australian industry since 1 July 2024.

Rondo makes itself available to the Commission to discuss this matter at any point.

FOR AND ON BEHALF OF

Rondo Building Services Pty Limited

THE AUSTRALIAN INDUSTRY APPLICANT

² Ibid, p. 18.

³ Ibid, p. 23.

⁴ Customs Act, 1901.

⁵ The earliest a PAD can be made in this investigation is 27 October 2024, being 60 days after the 28 August 2024 initiation date.