

12 March 2025

Anti-Dumping Commission
Investigations
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Public File

Dear Director,

Investigation No. 650 – Steel Corner Beads and Angles (SCBA)

Investigation No. 653 – Ceiling Steel Framing Members from China (CSFM)

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 response to the recent submission by the Intex International Group (**Intex**). While certain arguments have been presented in the Intex submission, they are farcical and devoid of substance or merit. Moreover, the claim of an abuse of process is entirely unfounded.

Given these submission deficiencies, a response to these points has been provided succinctly below. The relevant skerrick's of the Intex arguments are presented, followed by a coherent, logical, and commercially sensible response by Rondo.

1. The like goods

Intex presents a convoluted argument, attempting to self-define and consolidate SCBA's and CSFM's into a *walling system* product category.¹

An injury assessment cannot divorce itself from the manner in which the market typically operates and how "the product" is defined in that market. In this case csfm and scba are individual parts of "the product". They are not isolated as "the product". Because there are so many other parts in "the product", the individual prices of csfm and scba cannot be decisive with respect to any end user's ultimate wall system preference.

Contrary to these claims, both goods operate in the market on an independent basis and are *decisive* in end user preference.

To correct the record firstly, however, a *walling system* can be understood as comprising certain separate but interconnecting steel components. Subsequent to connection, the components do not then need other products to complete the system. After installing the connected wall framing components, they are then covered by plasterboard. At Non-Confidential Attachment 1, Rondo provides examples of its *Steel Stud Drywall Framing System* (internal walls, pages 34-42) and *Maxiframe External Wall Framing System* (external walls, pages 44-46). Clearly obvious is a difference between these products and SCBA's / CSFM's.

¹ Intex submission, EPR folio no. 7 (INV 653), and folio no. 8 (INV 650), p. 4.

Turning to the goods in question – for SCBA’s, the goods are a standalone product and not part of any system, hence why the word “system” is omitted from product branding (by Rondo or otherwise). At Non-Confidential Attachment 1, these products can be found at pages 52-57. SCBA’s are installed at the corners of plasterboard (vertically or horizontally) to provide a smooth finish and knock-resistant edge. They do not come into contact with any wall framing components. As they are not part of a wall framing system, SCBA’s are not engineer-specified nor are they provided in any wall framing design.

CSFM’s are installed directly to timber or connected to a clip, and then finished with plasterboard in ceiling applications. CSFM’s are applied in housing and commercial applications and are not part of wall framing systems. For home design, it is typically the builder or architect who specifies their use. At Non-Confidential Attachment 1, these products can be found at pages 10-11.

Rondo therefore suggests that Intex re-assess its understanding of the goods in question – not only is this understanding factually inaccurate vis-a-vis these trade remedy inquiries, it is also inaccurate from an Australian market and commercial perspective (more on this below).

2. Material injury and pricing

Disproving Intex’s arguments via the above then negate any comments concerning a lack of material injury to the Australian Industry. By their own admission, the notion of material injury is fatuous where the products comprise two minor kinds of a walling system. It has now been established that they don’t, therefore the views held by Intex should be disregarded in totality by the Commission. Nevertheless, Rondo provides the following in relation to other aspects of the submission to officially correct the record.

i). Rondo’s corporate profitability

No detailed response is required on this point, except to state that a simple assessment of the *like goods* provisions of the *Custom Act 1901* would reveal that the Commission is legislatively obliged to assess material injury at a detailed product level. Like goods, in relation to goods under consideration in a trade remedies inquiry, means goods that are identical in all respects to the goods under consideration or, although not alike in all respects to the goods under consideration, have characteristics closely resembling those goods under consideration.² The Commission goes to great length to make such an assessment, including, inter alia, the utilisation of Model Control Codes.

As the Commission will make a detailed like goods assessment, any connection Intex seeks to make to Rondo’s corporate wide profitability should be ignored.

ii). Profit-led inflation

Intex claims that Rondo substantially increased the price of its metal products, by just under 70%, over the 18 months ending September 2022,³ and included the following table in support:⁴

Company	Date	Percentage	Product group
Rondo	March 2021	2.95%	Metal
	June 2021	7.00%	Metal
	September 2021	18.10%	Metal
	December 2021	17.25%	Metal
	September 2022	9.75%	Metal
Total 18-month price increase			67.41%

Intex submission excerpt: quarterly price increases

² Dumping and Subsidy Manual, December 2021, p. 10.

³ Intex submission, p. 6.

⁴ Ibid.

Rondo questions the validity of this detail on two fronts; firstly, the simple addition of the above percentages calculates to **55.05 percent**, not 67.14 percent. If there is certain additional data that sits behind the Intex calculation, this should have been disclosed. If there is no additional data, the implications are obvious.

Secondly, the raw material steel cost alone over the above-tabled period accounted for approximately [XX] percent of any price increase. The fact that this is well-higher than the above calculations proffered by Intex indicates that Rondo did nothing of the sort concerning price gouging.

On these two points alone, the Intex arguments should be dismissed.

Furthermore, the reference by Intex to the price increases listed on the PMC website is misleading. In footnote 17 of the submission,⁵ Intex provides a link to the PMC website. Regrettably, this link only refers to changes to the list price of the goods, which doesn't show the actual price customers are paying after discounts and rebates are applied. For example, Confidential Attachment 2 provides pricing from [**confidential text deleted: known competitor price points**] list price for CSFM's. With a discount this large, the list price is arguably non-transparent and irrelevant.

At Confidential Attachment 2.1, Rondo's lowest per metre price is shown for certain SCBA's and CSFM's. [**Confidential text deleted: Rondo pricing details**].

iii). The Intex business

Intex states that:⁶

Intex's prices for its imported wall systems have not affected the upward march of announced prices of the Australian manufacturers. Intex is a small competitor, holding a very small percentage of the market. It is up against Rondo and other major manufacturers who together control the vast part of the metal ceiling and wall systems market. Intex can do nothing in volume terms that can impact the Australian industry's price control of the ceiling and wall system market.

Far from being a minnow, the available evidence suggests that Intex has achieved significant volume growth and expansion in Australia in recent years:

- Intex relocated to a brand new 8,000m² purpose-built head office in Victoria during 2022:
 - [Intex expands into \\$11.3m site at Vaughan Constructions Biodiversity Business Park Epping CBRE | The Industrialist](#)
 - [Vaughan Constructions - Building Customers for Life | Intex Group International Global HQ](#)
- Intex opened a new large warehouse in Tasmania during 2024 (see Non-Confidential Attachment 3) and are [**confidential text deleted: known competitor price points**] (see Confidential Attachment 4);
- Intex upgraded its showroom and warehouse in Adelaide in 2025 (see Non-Confidential Attachment 5).; and
- when advertising for a new Sales Manager role in late CY2024, Intex explained their team as ...*fast-growing*... and state that their Territory Sales Managers will grow by 60% within 12 months (...*Overseeing a growing team of Territory Sales Managers – Commercial. 5 currently but expected to grow to at least 7-8 in the next 12+ months*) (see Non-Confidential Attachment 6). Another advertisement around the same time explained that ...*as our company continues to expand, we are creating new roles in every department.* (see Non-Confidential Attachment 7).

Intex is far from a small competitor in the Australian market, and is able to affect material injury on the Australian industry.

⁵ At page 7.

⁶ Ibid, p. 7.

iv). Does Intex understand the market?

During the first *Cutting Corners* investigation, Rondo factually highlighted areas of non-compliance to relevant product standards ([Cutting Corners Investigation](#)), with some examples taken directly from [**confidential text deleted: examples of non-compliance**]. ([Our commitment to the Industry](#)).

Rondo then [**confidential text deleted: examples of non-compliance**]. ([Cutting Corners Investigation Series 1, Part two: Base Metal Thickness & Compliance Concerns | Rondo](#)).

In its submission Intex points out the obvious that product standards issues are separate to anti-dumping complaints. Rondo concurs, and would add that anti-dumping complaints are divorced from importers choosing to sell non-compliant product [**confidential text deleted: opinion on standards compliance**]. Certainly, Rondo has not made mention of such matters at any time to-date in these trade remedy inquiries, nor has it sought to conflate issues. This can be validated by the Commission, and should have been checked by Intex.

What is relevant, however, is the context in which the Commission can take the above as an indication of Intex's true understanding of the market. [**Confidential text deleted: examples of non-compliance**]. This points to an overall lack of validity of the statements made in its submission to INV 650 and 653.

FOR AND ON BEHALF OF
Rondo Building Services Pty Limited

THE AUSTRALIAN INDUSTRY APPLICANT