



Application for a
review of
anti-dumping measures

**APPLICATION UNDER SECTION 269ZA OF THE *CUSTOMS ACT 1901*
FOR A REVIEW OF ANTI-DUMPING MEASURES**

In accordance with section 269ZA of the *Customs Act 1901* (the Act)¹, I request that the Commissioner of the Anti-Dumping Commission initiate a review of anti-dumping measures in respect of the goods the subject of this application to:

1. **revise the level of the measures** because one or more of the variable factors relevant to the taking of measures have changed (a variable factors review)

In this case the factors that I consider have changed are:

- normal value
- export price
- non injurious price
- subsidy

The variable factors review is in relation to:

- a particular exporter - [Baowu Group Echeng Iron and Steel Co., Ltd.](#)
- exporters generally

or

2. **revoke the measures** because the anti-dumping measures are no longer warranted (a revocation review)

In this case the measure I consider should be revoked is:

- the dumping duty notice
- the countervailing duty notice
- the undertaking

The revocation review is in relation to:

- a particular exporter (*if so provide name and country details*)
- exporters generally

NOTE

Where seeking variable factors review as well as a revocation review, indicate this in *both* 1 and 2 above.

¹ All legislative references are to the *Customs Act 1901*.

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DECLARATION

I believe that the information contained in this application:

- provides reasonable grounds for review of the anti-dumping measure; and
- is complete and correct to the best of my knowledge and belief.

Signature:

Name: [REDACTED]

Position: Director of Comprehensive Trade Department

Company: Baowu Group Echeng Iron and Steel Co.,Ltd

ABN: Not applicable

Date: 24 April 2025

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About this form

Section 269ZB(1)(b) of the Act requires that an application under section 269ZA of the Act for the review of measures published in a dumping duty notice or countervailing duty notice must be in a form approved by the Commissioner under section 269SMS(1) for those purposes. This is the approved form.

Signature requirements

Where the application is made:

By a company - the application must be signed by a director, servant or agent acting with the authority of the body corporate.

By a joint venture - a director, employee, agent of each joint venturer must sign the application. Where a joint venturer is not a company, the principal of that joint venturer must sign the application form.

On behalf of a trust - a trustee of the trust must sign the application.

By a sole trader - the sole trader must sign the application.

In any other case - contact the Anti-Dumping Commission's (the commission's) client support section for advice.

NB: Where an application is made by an agent acting with authority on behalf of a company, joint venture, trust or sole trader, an authority to act letter must be provided with this application.

Assistance with the application

The commission provides a free-of-charge document checking service, available prior to formal lodgement, to assist applicants to ensure that their applications meet the documentary requirements, see "before you apply": <https://www.industry.gov.au/anti-dumping-commission/apply-anti-dumping-or-countervailing-duties-measures>

The commission has also published guidelines to assist applicants with the completion of this application (for investigations, continuations, reviews): <https://www.industry.gov.au/anti-dumping-commission/apply-anti-dumping-or-countervailing-duties-measures>

The commission's client support section can provide information about dumping and countervailing procedures and the information required by the application form. Contact the team on:

Phone: 13 28 46 or +61 2 6213 6000 (outside Australia)

Email: clientsupport@adcommission.gov.au

Information is available from the commission's website at www.adcommission.gov.au.

Small and medium enterprises (i.e., those with less than 200 full-time staff, which are independently operated and which are not a related body corporate for the purposes of the *Corporations Act 2001*), may obtain assistance, at no charge, from the Department of Industry, Science and Resources' International Trade Remedies Advisory (ITRA) Service. For more information on the ITRA Service, visit www.business.gov.au/ITRA, email us at itra@industry.gov.au, or telephone the ITRA Service Hotline on +61 2 6213 7267.

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Review Period

The review period is *generally* the 12 month period preceding the initiation date and ending on the most recently completed month or quarter.

For the purposes of information requested in this application, please consider the review period as the 12 month period ending on the most recently completed quarter prior to the date that you submit the application.

The actual review period will be set by the Commissioner if a review is initiated, and may differ to that used by the applicant in the application form.

Required information

1. Provide details of the name, street and postal address, of the applicant seeking the review.
2. Provide details of the name of a contact person, including their position, telephone number and e-mail address.
3. Name other parties supporting this application.
4. Describe your interest as an affected party (e.g. are you concerned with the exportation of the goods, the importation of the goods, or part of the Australian industry, or acting on behalf of the Government of an exporting country).
5. Provide details of the current anti-dumping measure(s) the subject of this review application and the goods subject to the measure(s), including:
 - tariff classification
 - the countries and/or companies
 - specified date of publication of the measure
6. If you are an exporter of the goods the subject of this application please answer the following questions:
 - Have you exported the goods to Australia during the review period?
 - o If yes, what was the total quantity and total value of the goods exported to Australia during the review period?
 - Have you previously (prior to the review period) exported the goods to Australia?
 - o If yes, please provide the total quantity and total value of the goods exported to Australia each year during the three years prior to the review period.
 - Have you exported like goods to countries other than Australia during the review period?
 - o If yes, please provide the total quantity and total value of exports of the goods to each other country during the review period. Please indicate if any of the sales are to a related party.

NB: In relation to the goods the subject of this application, 'like goods' means goods that are identical in all respects to the goods the subject of this application or, although not alike in all respects to the goods the subject of this application, have characteristics closely resembling those goods (s 269T(1) refers).

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NB: Please note you must provide this information if you are an exporter of the goods the subject of the application. If you are not an exporter of the goods, you may choose to provide information relevant to this question.

7. Provide the names, addresses and telephone numbers of other parties likely to have an interest in this matter e.g. Australian manufacturers, importers, exporters and/or users.

Applications for review of variable factors

If you are applying for a variable factors review (in box 1 above) provide a detailed statement setting out your reasons. Include information about:

- the factor(s) you wish to have reviewed;
- the amount by which that factor is likely to have changed since anti-dumping measures were last imposed, and evidence in support; and
- in your opinion the causes of the change and whether these causes are likely to persist.

Application for a revocation review

If you are applying for a revocation review (in box 2 above), provide a detailed statement setting out your reasons.

Include evidence in support of your view that there are reasonable grounds for asserting that the measures are no longer warranted. Refer to the *'Instructions and guidelines for applicants: Application for review or revocation of measures'* as part of preparing your response. If you consider anti-dumping measures are no longer warranted because of:

- *no dumping or no subsidisation*: provide evidence that there is no dumping, or no subsidy, and why dumping or subsidisation is unlikely to recur if measures were revoked.
- *no injury*: provide evidence that there is no current injury, and there is unlikely to be a recurrence of injury if the measures were to be revoked.

Lodgement of the application

This application, together with the supporting evidence, must be lodged in the manner approved by the Commissioner under subsection 269SMS(2) of the Act. The Commissioner has approved lodgement of this application by either:

- email, preferably, using the email address clientsupport@adcommission.gov.au;
- upload to SIGBOX (SIGBOX is our secure online lodgement platform, suitable for large files or attachments - email us to arrange access), or
- post to:

The Commissioner of the Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

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Effective immediately:

- Applications are taken to be lodged or received by the Commissioner when it is first received by a commission staff member doing duty in relation to applications.
- Staff members are on duty receiving applications from 9:00am to 5:00pm (AEST or AEDST) on business days that are not an Australian Capital Territory public holiday, or during Annual Closedown*.

Definitions in this application:

- **AEST** means Australian Eastern Standard Time.
- **AEDST** means Australian Eastern Daylight Savings Time
- **business day** means a day that is not a Saturday or Sunday.
- **Annual Closedown** means the 3 business days the commission is closed between Christmas Day and New Year's Day.

* Public holidays are listed at: <https://www.fairwork.gov.au/employment-conditions/public-holidays>

Public Record

During a review all interested parties are given the opportunity to defend their interests, by making a submission. The commission maintains a public record of these submissions. The public record is available on the commission's website at www.adcommission.gov.au.

At the time of making the application both a confidential version (for official use only) and non-confidential version (public record) of the application must be submitted. Please ensure each page of the application is clearly marked "FOR OFFICIAL USE ONLY" or "PUBLIC RECORD". The non-confidential application should enable a reasonable understanding of the substance of the information submitted in confidence, clearly showing the reasons for seeking the review, or, if those reasons cannot be summarised, a statement of reasons why summarisation is not possible. If you cannot provide a non-confidential version, contact the commission's client support section for advice.

FOR OFFICIAL USE ONLY

**BAOWU GROUP ECHENG IRON AND STEEL CO., LTD.
APPLICATION FOR REVIEW OF MEASURES**

1. Applicant:

Company name: Baowu Group Echeng Iron and Steel Co., Ltd. ("Echeng")
Address: No. 215, WuChang Road, Echeng District, Ezhou City, Hubei Province, China.
Echeng is engaged in the manufacture and exportation of steel reinforcing bar from China.

2. Contact person:

Name: [REDACTED]
Position: Export Director
Phone: [REDACTED]
Email: [REDACTED]

Name: John Bracic – J.Bracic & Associates
Tel: +61 (0)499 056 729
Address: PO Box 3026, Manuka ACT 2603
Email: john@jbracic.com.au

3. Other interested parties:

Name: Infrabuild (Newcastle) Pty Ltd* ("InfraBuild")
Street address: Level 34, 50 Bridge Street, Sydney NSW 2000

4. Interest as an affected party:

Echeng is engaged in the manufacture and exportation of steel reinforcing bar from China.

5. Details of current anti-dumping measures:

Goods description:

Hot-rolled deformed steel reinforcing bar whether or not in coil form, commonly identified as rebar or debar, in various diameters up to and including 50 millimetres, containing indentations, ribs, grooves or other deformations produced during the rolling process regardless of the particular grade or alloy content or coating.

Tariff classification:

The goods are classified to the following tariff subheadings in Schedule 3 to the Customs Tariff Act 1995:

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Tariff Classification	Statistical code
7213.10.00	42
7214.20.00	47
7227.90.10	69
7227.90.90	01, 02, 04
7228.30.90	40
7228.30.10	70
7228.60.10	72

Country subject to the notice:

The People's Republic of China

Date of publication of the notice:

On 13 April 2016, the Assistant Minister for Science and the Parliamentary Secretary to the Minister for Industry, Innovation and Science, published a dumping duty notice on steel reinforcing bar exported to Australia from China.

6. Details of exports

Have you exported the goods to Australia during the review period? **No.**

Have you previously (prior to the review period) exported the goods to Australia? **No.**

Have you exported like goods to countries other than Australia during the review period? **No.**

7. Grounds for Review

Echeng is requesting a review of the variable factors on the basis of a change in the ascertained normal value, which was last determined on the basis of verified information during the review period 1 April 2016 to 31 March 2017 in Review 411, 412 and 423. Subsequent reviews and continuation inquiries have relied on the normal values from Review 411, 412 and 423.

ASCERTAINED NORMAL VALUE

Basis for current ascertained normal values

During the previous review of measures applying to steel reinforcing bar exported from China (Review 563), which had a nominated review period of 1 July 2019 to 30 June 2020, the Anti-Dumping Commission (Commission) constructed normal values pursuant to subsection 269TAC(6) of the Customs Act 1901 (the Act) on the basis of the normal value established by Review 467, adjusted for timing by reference to movements in a relevant benchmark for billet prices.

The normal values in Review 467 were determined on the basis of normal values established in Reviews 411, 412 and 423, minus any favourable adjustments, and a timing adjustment to reflect the Chinese domestic prices for rebar during the current review period.

Grounds for review of ascertained normal values

Echeng requests a review of the notice as it is currently subject to the country-wide dumping duty rate of 19.0% outlined in ADN 2020/140 following completion of review 563. This rate reflects the dumping margins determined for non-cooperating exporters.

As Echang did not export the goods to Australia during the original investigation period or the more recent period of review from case 563, it was not contacted and investigated by the Commission, and as such did not have the opportunity to participate to allow for an individual determination of its ascertained variable factors. Given the methods used to determine the ascertained variable factors for non-cooperating exporters, the current interim dumping duties are clearly inappropriate, as they do not reflect Echeng's actual circumstances.

Therefore, Echeng requests the determination of ascertained variable factors based on its own domestic sales and costs.

Contemporary normal values

Echeng contends that published contemporary prices for steel rebar sold in China provides an accurate measure of comparable normal values. Based on Chinese rebar futures prices sourced from the Shanghai Futures Exchange, Echeng estimates an average domestic selling price for the proposed review period of 1 April 2024 to 31 March 2025 as RMB █████/mt or US\$ █████/mt. The monthly pricing is shown in the table and graph below, which is also included in **Confidential attachment A**.

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	A) Chinese domestic rebar prices (RMB/mt)	RMB:USD	A) Chinese domestic rebar prices (USD/mt)
Apr-24		7.238	
May-24		7.233	
Jun-24		7.254	
Jul-24		7.261	
Aug-24		7.149	
Sep-24		7.074	
Oct-24		7.088	
Nov-24		7.206	
Dec-24		7.282	
Jan-25		7.296	
Feb-25		7.262	
Mar-25		7.269	
Average			

China Steel Rebar Futures

MacroMicro.me | MacroMicro



— China Steel Rebar Futures

Source: <https://en.macromicro.me/charts/1307/china-steel-rebar-futures>

Contemporary export prices

Given that the export prices determined by the Commission in the previous two reviews were based on relevant information due to the lack of exporter cooperation, Echeng does not consider it appropriate to apply a timing adjust to calculate contemporary export prices.

Instead, Echeng considers it reasonable to estimate Chinese export prices using a published series of actual export prices for steel rebar. The table below shows monthly FOB export prices

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	B) Chinese FOB export prices (US\$/MT)
Apr-24	
May-24	
Jun-24	
Jul-24	
Aug-24	
Sep-24	
Oct-24	
Nov-24	
Dec-24	
Jan-25	
Feb-25	
Mar-25	
Average	

Source: <https://www.scrapmonster.com/metal-prices/rebar-hrb400-20mm-price/1795#>

Based on the data in the table above, the estimated average export price for the proposed accelerated review period is US\$ [redacted] /mt, which is also included in **Confidential attachment A**.

Further support for a change in export prices is the graph below showing the historical movement in steel rebar prices. A comparison of Chinese rebar prices between 563 review period (approximately RMB [redacted] /mt) and the proposed review period, being the 12 months ending March quarter 2025 (approximately RMB [redacted] /mt), shows that prices have fallen by approximately 11%. The chart below shows historical movements in Chinese rebar prices and the average price points for the two nominated periods.



Source: <https://tradingeconomics.com/commodity/steel>

The contemporary information presented demonstrates that the ascertained export prices have changed since the last review in 2020. Most importantly, the ascertained export price currently applicable to Echeng’s future exports continue to be unreasonable given that they are based on a non-cooperative determination in Review 563, which has no relevance to Echeng’s exports on the basis that Echeng has not previously exported to Australia at dumped prices.

Contemporary dumping margin

Based on the published export prices and normal values outlined above, Echeng estimates the following contemporary variable factors:

- export price = US\$ [redacted] /mt
- normal value = US\$ [redacted] /mt
- dumping margin = [redacted] %.

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This would result in a floor price measure set at US\$ [REDACTED] /mt, which would apply to Echeng's future exports of steel reinforcing bar.