Abey AU

14 July 2025

Anti-Dumping Commission
Investigations 2
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Melbourne Victoria 3001

Email: investigations2@adcommisison.gov.au

Public File

Dear Director,

Investigation No. 644 concerning Interchangeable Bolted Clipping System Brackets from China

The member of the Australian industry producing like goods to the goods the subject of this inquiry, Abey Australia Pty Limited (**Abey**), provides this submission in relation to the recently published *Statement of Essential Facts* (**SEF 644**).

1. SEF 644 confirms substantial dumping margins and material injury

On 27 June 2025, the Anti-Dumping Commission (**the Commission**) published SEF 644, with the Commission finding that the goods exported to Australia from China during the investigation period were dumped by the following margins:

Exporter	Effective rate of IDD before application of lesser duty	Effective rate of IDD after application of lesser duty
Fenghui	91.3%	47.6%
All other exporters	101.1%	54.4%

SEF 644 excerpt: Table 4[1]

SEF 644 has also found that the dumping has caused material injury. SEF 644 has found that:

- importers purchased the goods from China at dumped prices, which allowed those importers to be significantly more competitive on price than would have been the case had the goods not been dumped;
- the Australian industry's prices for all types of brackets were undercut by the dumped goods in the investigation period;
- as the Australian industry was not prepared to lower its prices to compete with the dumped exports from China, it has foregone sales leading to a material reduction in its market share in the investigation period; and

[1] SEF 644, p. 10.

- by ceding sales volumes and market share to dumped imports from China in a growing market, Australian industry has foregone profit it would otherwise have achieved.

The SEF is evidenced-based and well-reasoned. All relevant aspects have been considered and appropriately decided by the Commission in arriving at the preliminary assessment. Abey therefore welcomes these key findings and recommendations and looks forward to the same being made in the final report to the Minister.

Abey remains at the disposal of the Commission for the remainder of INV 644.

FOR AND ON BEHLAF OF

Abey Australia Pty Limited

THE AUSTRALIAN INDUSTRY APPLICANT