

**Jettransit PTY LTD****ABN: 52 166 772 541**

Suite 805, Level 8, 50 Clarence St,

Sydney, NSW 2000

Australia

30 Oct 2025

The Director  
Investigations 4  
GPO Box 2013  
Canberra ACT 2601  
Australia

**ANTI-DUMPING NOTICE NO. 2025/110 – Investigation No.690**

Dear Sir/Madam

It has come to our attention that an investigation (No.690) has been initiated by the Anti-Dumping Commission into the importation of Freight Railway Wheels from The People's Republic of China.

Jettransit contends that it is an Interested Party in this investigation and is making this confidential unsolicited submission for the Commissioner's consideration.

Our interest in this investigation is based on the fact that we are an importer and reseller of freight wheels from China into Australia. We made our first import of wheels in August 2025. We note that this is outside of the time period of the investigation, however, any outcome will have a material impact on our business. Further, we believe that we are able to offer relevant information regarding the business of importing freight wheels, in particular as to how it relates to non GOC manufacturers.

Jettransit is a wholly owned Australian company, and our main business is the supply of components and subsystems for use on railway rolling stock in both passenger and freight applications. Additional general information can be found on our website

<https://jettransit.com.au> .

Our supplier of wheels is Shandong Bohong Rail Transportation Equipment Technology Co., Ltd. (BHR) located in the city of Dongying, Shandong Province in China [Shandong Bohong Rail Transit Equipment Technology Co., Ltd.](#) We understand that BHR is a privately owned

**NON CONFIDENTIAL**

**Jettransit PTY LTD****ABN: 52 166 772 541**

Suite 805, Level 8, 50 Clarence St,

Sydney, NSW 2000

Australia

---

company that was established in April 2020, making it a relatively new player in the wheel market.

BHR have a modern factory that is equipped with the latest wheel manufacturing technology and equipment from Europe. It was designed specifically for the efficient mass production of railway wheels and features a high level of automation in the material handling as well as process controls. Like many modern manufacturers BHR relies on technology rather than cheap labour to lower cost. BHR employs a team of highly qualified and experienced technicians, many of them with years of experience in the design and manufacturing of railway wheels in China and Internationally.

BHR does not make its own steel. As it competes in the local Chinese market with the established GOC wheel manufactures it prefers to purchase steel from suppliers that are not aligned with their competitors. To this end BHR primarily purchases steel from two steel makers who are also privately owned companies. This means that the prices paid by BHR for steel inputs is a reflection of open market prices.

There is no ownership or controlling relationship between Jettransit and BHR. Our relationship is that of buyer and seller. We do have a collaboration agreement in place to develop and sell railway wheel products into the Australian and New Zealand markets. Our transactions are based on normal commercial terms and conditions associated with the supply of products. We do not have any profit sharing or rebate arrangements in place.

Our approach to marketing of the wheels is to provide a product that at a minimum meets and where possible exceeds the technical and performance requirements specified by the end customer. Further, we have invested in design and development of the product, which we believe makes our products superior to the locally produced alternative.

Our wheel product is able to be offered at a competitive price due to the much higher levels of efficiency in the production process.

The main cost savings drivers are:-

- Highly automated and tightly control manufacturing processes that reduces wastage and non-conforming products.
- Lower energy unit inputs due to modern high efficiency furnaces. This also has the added benefit of lower Carbon and Nox emissions.

**NON CONFIDENTIAL**

**Jettransit PTY LTD****ABN: 52 166 772 541**

Suite 805, Level 8, 50 Clarence St,

Sydney, NSW 2000

Australia

- 
- Fewer parties in the supply chain.

Other differentiating characteristics of our product in comparison to the local alternative include

- Longer warranty periods
- Higher degree of quality due to the nature and frequency of in-process inspections.

Our first import of wheels was made in August 2025 and sold to [REDACTED]. Accordingly, we do not have any sales data for the 24-25 financial year. We would be willing to supply financial data for the current financial year if the Commission deems it relevant.

Our projected sales volume in the current financial year for the MCC 840 OD is [REDACTED]. It is our intention to expand the catalogue of different sizes of wheels that we sell to include other sizes listed in the MCC list.

In addition, we are actively pursuing to expand our service footprint in Australia to meet growing demand of component servicing involving the replacement of worn wheel discs. To realise this, we will make significant investments in new facilities and create additional employment opportunities within Australia. We believe that the imposition of a blanket tariff on the importation of Railway Freight Wheels will jeopardise those plans.

In our case, we believe strongly that we are providing a competitively priced product that does not enjoy any direct support or subsidy from the Chinese government. Moreover, that our competitive advantage lies in more efficient process and a superior product that can be provided at a lower and sustainable price.

Restricting our business or imposing a higher price also has flow on implications for our customers through increased cost. This will impact their competitiveness and encourage the use of other less efficient, more environmentally polluting modes of transport. This is relevant for both passenger and freight applications. The imposition of a tariff would place an ongoing burden on the Australian rail industry and Australian economy as a whole to support an inefficient supplier.

Whilst unfortunate, the loss of local wheel manufacturing is regrettable it is not a strategic risk to the Australian industry with many other countries beyond China able to supply suitable alternatives. In saying that, we are supportive of any efficient local manufacturing, however, add that it should be subject to fair competition that encourages innovation,

**NON CONFIDENTIAL**

**Jettransit PTY LTD****ABN: 52 166 772 541**

Suite 805, Level 8, 50 Clarence St,

Sydney, NSW 2000

Australia

---

sustainability, investment and productivity gains for the benefit of the Australian rail industry as a whole.

We make this submission sincerely and desire to be of assistance in this investigation and are happy to provide further input that may help Commissioner in their consideration.

Your Sincerely

Peter Hong Ning

Chief Executive Officer

Encl. Copy of 690- importer questionnaire Section A Jettransit response.

**NON CONFIDENTIAL**