

December 24, 2025

Anti-Dumping Commission
Investigations 4
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Melbourne VIC 3001

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Public File

Dear Director,

Investigation No. 690 concerning Freight Railway Wheels from China

1. Preliminary Affirmative Determination Welcomed

The member of the Australian industry producing like goods to the goods the subject of this inquiry, Commonwealth Steel Company Pty Limited (**Comsteel**) welcomes the *Preliminary Affirmative Determination (PAD 690)*¹ published by the Anti-Dumping Commission (**the Commission**) on Day 60 of the investigation and consequent the imposition of provisional securities at 36.9 percent.

Comsteel notes that the publication of a PAD on Day 60 is unprecedented in recent history and commends the Commission for the thoroughness and quality of analysis undertaken within this timeframe. This outcome demonstrates the Commission's commitment to providing timely relief to injured Australian industries while maintaining rigorous investigative standards.

2. Dumping Findings

Comsteel supports the Commission's preliminary finding of a dumping margin of 36.9 percent, substantially above the negligible threshold. The Commission has appropriately applied the normal value methodology under section 269TAC(6) – the use of European Union benchmark pricing, Comsteel's verified conversion costs adjusted for Chinese labour rates, and appropriate profit margins provides a sound basis for the normal value determination.²

3. Material Injury

Comsteel welcomes the Commission's findings that the Australian industry has suffered material injury across multiple indicators, these being:³

- lost sales volume and market share;
- lower production volumes;

¹ ADN 2025/125.

² Ibid, p. 6-7.

³ Ibid, p. 9 and analysis at p. 9-18.

- price suppression;
- loss of profits;
- loss of profitability;
- decline in asset values;
- reduced research and development;
- reduced revenue;
- reduced return on investment;
- reduced capacity utilisation; and
- reduced productivity.

The Commission's analysis correctly identifies the causal link between dumped imports and injury, particularly through price undercutting of approximately 22 percent⁴ and the suppression of Comsteel's ability to achieve compensatory pricing.

4. Countervailing Investigation

While the countervailing investigation remains ongoing, Comsteel is confident that further analysis will establish the existence of countervailable subsidies provided to Chinese exporters at above negligible levels, consistent with the application allegations made by Comsteel and subsidisation patterns observed in other Chinese steel product trade remedy investigations.

5. Cooperative Status of Chinese Exporters

At initiation, the Commission requested exporters respond to an exporter questionnaire by 1 December 2025. No responses were received by the due date. However, one exporter, Baowu Group Masteel Rail Transit Materials Technology Company Ltd (**Masteel**), requested an extension to submit its response. The Commission has subsequently granted Masteel an extension to respond to the exporter questionnaire by 2 January 2026 and is yet to determine whether Masteel is an uncooperative exporter.⁵

Comsteel urges the Commission to consider Masteel as an uncooperative exporter notwithstanding the extension granted until 2 January 2026. Treating Masteel otherwise would prevent the timely conduct of the inquiry and the timely consideration of publishing the *Statement of Essential Facts*,⁶ thereby undermining the overall effectiveness of the provisional measures while the inquiry is undertaken. As Masteel did not provide a response within the legislated 37-day period, it should be treated as uncooperative to preserve procedural integrity and investigation timelines.

FOR AND ON BEHALF OF

Commonwealth Steel Company Pty Limited

THE AUSTRALIAN INDUSTRY APPLICANT

⁴ Ibid, p. 17.

⁵ Ibid, p. 2 (at footnote 2) and p. 4.

⁶ Currently due 10 February 2026.