

12 January 2026

The Director, Investigations 3  
Anti-Dumping Commission  
GPO Box 2013  
Canberra ACT 2600

**BY EMAIL:**  
**investigations3@adcommission.gov.au**

Dear Director,

**Continuation Inquiry No. 675 in relation to Rod in Coil exported from the People's Republic of China (China)**

**STATEMENT OF ESSENTIAL FACTS NO. 675 - AUSTRALIAN INDUSTRY SUBMISSION**

InfraBuild (Newcastle) Pty Ltd (**InfraBuild**), the Australian industry applicant for continuation of these measures, makes this submission in support of the Commissioner's proposed recommendations contained in *Statement of Essential Facts No. 675 (SEF 675)*.<sup>1</sup>

In particular, InfraBuild supports the Commissioner's preliminary recommendations and findings that:

- the measures apply to all exporters as if different variable factors had been ascertained from 23 April 2026;
- the Australian industry remains susceptible to material injury caused by dumped exports;
- the expiry of the measures would lead, or would be likely to lead, to a continuation or recurrence of the dumping and material injury that the measures are intended to prevent;
- a particular market situation continued to exist in respect of the domestic market for the like goods in China during the inquiry period, and that the influence of the government of China over the steel industry in China has distorted steel billet costs in China such that input

---

<sup>1</sup> *EPR Doc. No. 675/008* (23 December 2025).

costs for steel billet in China are not suitable to use to construct a normal value for exporters;  
and

- in continuing the anti-dumping measures, the combination duty method continue to be used to calculate the interim dumping duty payable by all exporters from China.

The continuation of the measures from 23 April 2026 is important to the survival of the Australian industry producing rod in coil, and the ongoing employment of numerous Australian workers both directly and indirectly by InfraBuild. Similarly, the recommendation that the combination method of interim duty calculation be applied is critical to the effectiveness of the measures, and serves to reduce the risk of circumvention by way of duty absorption.

Further, the importance of the Commissioner's contemporary analysis of the particular market situation in China in respect of the domestic market for rod in coil cannot be understated as it is a meaningful measure to stop the unprecedented steel production overcapacity in China, impacting trade susceptible markets, such as those in Australia.

InfraBuild encourages the Commissioner to make the recommendations contained in SEF 675 in his final report to the Minister.

Please do not hesitate to contact your InfraBuild representative on record with any questions.

FOR AND ON BEHALF OF THE

**AUSTRALIAN INDUSTRY APPLICANT**