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The Director - Investigations
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

CONTINUATION 669 AND REVIEW 676

STEEL REINFORCING BAR EXPORTED FROM THE PEOPLES REPUBLIC OF CHINA

Dear Director,

We are writing on behalf of Baowu Group Echeng Iron and Steel Co., Ltd ("Echeng"), in response to the Statement of Essential Facts No. 676 ("SEF 676"), published on 23 December 2025, concerning the review of anti-dumping measures applying to steel reinforcing bar ("the goods") exported to Australia from the People's Republic of China ("China") by Echeng.

Echeng accepts the findings and conclusions outlined in SEF 676, and endorses the Commission's findings as an accurate reflection of the facts on the record and supports the proposed recommendations to the Minister for Industry and Innovation and Minister for Science ("the Minister") that the dumping duty notice be altered to reflect these changed variable factors, pursuant to section 269ZDA(1)(a)(iii) of the Customs Act 1901.

Proposed floor price (Section 7)

In response to the proposed recommendations in section 7 of SEF 676, which outline the Commission's intention to recommend to the Minister that the anti-dumping measures be altered to apply the floor price method, Echeng respectfully requests that the Commission recommend that the floor price be imposed and denominated in United States Dollars (USD).

This request is grounded in the practical realities of international trade in steel products, including steel reinforcing bar. Like those of many global steel exporters, Echeng's export transactions are to be conducted in USD, which serves as the standard medium of

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exchange in the international steel market, facilitating consistency across diverse markets and reducing exposure to local currency risks.

Denominating the floor price in USD would align the measures with established trade practices and enhance administrative efficiency for all stakeholders. It would Echeng to directly compare its FOB (Free on Board) export prices against the floor price without conversion, thereby facilitating easier adherence to the measure.

Echeng submits that this adjustment would not alter the substantive protective effect of the proposed floor price but would enhance its practicality and fairness.

Yours sincerely,

John Bracic