

15 January 2026

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

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

Dear Director,

**Review No. 676 in relation to steel reinforcing bar exported from the People's Republic of China (China) by Baowu Group Echeng Iron and Steel Co., Ltd**

**AUSTRALIAN INDUSTRY REPLY TO EXPORTER'S RESPONSE TO SEF 676**

InfraBuild (Newcastle) Pty Ltd (**InfraBuild**) refers to the submission of the exporter, Baowu Group Echeng Iron and Steel Co., Ltd (**Echeng**), in response to *Statement of Essential Facts No. 676 (SEF 676)*, published on 14 January 2026.<sup>1</sup>

At the outset, InfraBuild opposes the Commissioner's recommendation to determine Echeng's ascertained export price by reference to its ascertained normal value. The reasons for this opposition will form the basis of a separate submission. For now, InfraBuild observes that in its submission the exporter seeks the Commissioner recommend that the floor price be imposed and denominated in United States dollars (**USD**). There are several reasons why the InfraBuild opposes such a recommendation being made.

Firstly, apart from Echeng's statement that it *proposes* to conduct its export transactions in USD, there is in fact no evidence supporting the contention that this will occur. Indeed, the Commissioner is reminded of his finding that '*Echeng did not export the goods to Australia*'<sup>2</sup> and '*did not sell like goods to a third country*

---

<sup>1</sup> EPR No. 669/012 and EPR No. 676/010.

<sup>2</sup> SEF 676, p. 8.

during the review period'.<sup>3</sup> Therefore, at this time, Echeng's statement concerning any future intent remains a mere assertion.

In any event, the Commissioner has proposed that 'Echeng's normal value is the most relevant information to ascertain the export price.'<sup>4</sup> In SEF 676, the commission calculated Echeng's normal value under subsection 269TAC(2)(c) using the sum of:

- Echeng's cost to make for rebar, with its steel billet costs adjusted by reference to a benchmark;
- Echeng's SG&A for its domestic sales;
- Echeng's profit on its domestic sales if they had been sold in the OCOT.

Further, as the commission found that Echeng's cost of production for steel billet does not reflect competitive market costs and is affected by circumstances that are not normal and ordinary, the commission adjusted Echeng's cost of production for steel billet by reference to a benchmark. The benchmark is based on Hoa Phat Hai Duong Steel Joint Stock Company's (**Hoa Phat**) verified cost of production of steel billet in Viet Nam, adjusted to reflect a cost of production in China.

A floor price denominated in USD would be unreliable and susceptible to exchange rate conversion errors given that:

- Echeng's cost of production information was likely recorded in Chinese yuan (**CNY**), and converted to Australian dollars (**AUD**), and
- Hoa Phat's verified cost of production of steel billet in Viet Nam was likely recorded in Vietnamese dong (**VND**), and converted to AUD at contemporaneous quarterly exchange rates for comparison to Echeng's cost of production for steel billet at comparable contemporaneous quarterly exchange rates.

Furthermore, InfraBuild observes that the *Dumping and Subsidy Manual* states the policy that the ascertained (**ANV**) will be 'denominated in the currency in which the domestic sales are made'.<sup>5</sup> Given that the floor price is based on the ANV, and that the ANV was determined constructively based on Echeng's domestic financial records of production denominated in CNY, and adjusted by a benchmark denominated in AUD, then it is appropriate that any floor price should be denominated in AUD.

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

FOR AND ON BEHALF OF THE

**AUSTRALIAN INDUSTRY APPLICANT**

---

<sup>3</sup> SEF 676, p. 25.

<sup>4</sup> SEF 676, p. 24.

<sup>5</sup> *Dumping and Subsidy Manual* (December 2021), p. 121.