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

REVIEW 676

STEEL REINFORCING BAR EXPORTED FROM THE PEOPLES REPUBLIC OF CHINA

Dear Director,

Baowu Group Echeng Iron and Steel Co., Ltd (Echeng) refers to the submission dated 16 January 2026 from InfraBuild (Newcastle) Pty Ltd (InfraBuild) in response to the Commissioner's Statement of Essential Facts No. 676 (SEF 676). Echeng rejects InfraBuild's misguided and self-serving assertions, which appear designed more to hinder fair competition than to reflect the facts or the law.

Summary

Echeng submits that:

- InfraBuild's attempt to fabricate an export price for Echeng by dredging up unrelated historical data from a distant entity ignores the clear findings in SEF 676 and the plain requirements of subsection 269TAB(3);
- the Commissioner's proposal to apply a floor price duty method at EXW terms is entirely appropriate and enforceable, and InfraBuild's speculative concerns about adjustments are unfounded and conveniently overlook Echeng's demonstrated ability to comply;
- sufficient clarification of Echeng's models has been provided, as all relevant information has been verified and provided in full; and
- InfraBuild's baseless claim regarding Echeng's ownership is irrelevant to this review and amounts to little more than an unsubstantiated smear, which the Commission should disregard.

For convenience, references to sub-headings are as they appear in InfraBuild's submission.

Export Price

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InfraBuild's insistence on conjuring an export price for Echeng based on purported "historical" data from Shandong Iron and Steel Company Limited, Laiwu Company (Shandong Laiwu) is a transparent effort to distort the record. The Commissioner correctly concluded in SEF 676 that Echeng did not export the goods to Australia during the review period or at any prior time, and that no relevant historical export prices exist for adjustment under subsection 269TAB(3).

InfraBuild's reliance on Accelerated Review No. 662 is misplaced and selective, as that review was terminated solely because the Commissioner found a relationship between Echeng and Shandong Laiwu for the purposes of assessing eligibility for accelerated review status, not for imputing export prices across unrelated periods or entities.

The notion that Shandong Laiwu's export prices from the original Investigation No. 300 (covering 1 July 2014 to 30 June 2015, a decade-old period) can be mechanically adjusted and applied to Echeng is practically absurd. Subsection 269TAB(3) requires the Commissioner to have regard to "all relevant information," yet InfraBuild proposes a contrived methodology that cherry-picks data from a different exporter in a vastly different market context. Comparing shipment volumes and applying percentage changes from other exporters, as InfraBuild suggests, introduces arbitrary assumptions and ignores the Commission's verified finding that no direct export activity by Echeng exists. Echeng urges the Commission to reject this overreach, which merely seeks to penalise Echeng for historical associations that have no bearing on current variable factors.

The ABF import data reviewed by the Commission confirms the absence of any prior export activity by Echeng, rendering InfraBuild's proposal nothing more than an ill-conceived attempt to manufacture dumping margins where none have been established.

Normal value

Proposed duty method and effective rate of duty

InfraBuild's concern over the proposed floor price duty method at EXW terms is exaggerated and dismissive of established administrative practices. The Commissioner rightly proposes this method in SEF 676, recognising that Echeng has no ascertained export price. InfraBuild's exaggerated claims about "impossible" implementation and risks of under-collection ignore the fact that Australian Border Force routinely handles delivery term adjustments in anti-dumping contexts.

Echeng has already indicated in its submission of 12 January 2026 that it intends to export on FOB terms and can readily compare its FOB export prices against an EXW floor price by making straightforward deductions for inland freight and port handling expenses, deductions that are standard in trade and verifiable through documentation.

InfraBuild's asserts that the Commission lacks information for an EXW to FOB adjustment, yet persists in proposing speculative sources for such adjustments. First, the inland freight rates from Echeng's domestic sales, as noted in the virtual verification report, pertain to customer-specific deliveries and are not directly applicable to export scenarios, which involve different routes, volumes, and logistics. Suggesting an adjustment based on these ignores the variability in transportation and the Commission's determination that no Echeng-specific export data

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exists. The distance to the nearest port is irrelevant without verified export costs, and InfraBuild's map-based speculation adds no substantive value.

Second, InfraBuild's proposal to borrow from SEF 669's adjustments for uncooperative exporters, or from Shandong Laiwu's ancient data adjusted by CPI, is equally flawed. These are not "relevant to Echeng". They are generalised figures from unrelated entities and periods. The Commissioner's finding in Accelerated Review No. 662 does not transform Shandong Laiwu's costs into Echeng's, and applying CPI adjustments to decade-old data would introduce inaccuracies that undermine the review's integrity. Echeng supports the Commission's prudent approach in SEF 676 and dismisses InfraBuild's suggestions as an attempt to inflate measures through unreliable proxies.

Further clarification of the exporter's models included in the normal value calculation

InfraBuild's vague call for "further clarification" of Echeng's models is unwarranted and appears to be a fishing expedition. All model details were provided in Echeng's response to the exporter questionnaire and verified, as documented in SEF 676. The normal value calculation, based on Echeng's domestic sales of like goods in the ordinary course of trade, requires no additional elaboration. InfraBuild's request should be viewed as an unsubstantiated delay tactic rather than a genuine concern.

The exporter is not a private company, but a State owned or invested enterprise

InfraBuild's final point ventures into irrelevant territory, asserting without evidence that Echeng is a state-owned or invested enterprise. This claim is immaterial to this review of variable factors under Division 5 of Part XVB. SEF 676's Appendix A addresses the particular market situation in China comprehensively, and ownership status does not alter the verified normal value or proposed duty method. InfraBuild's attempt to inject this diversion reflects a broader pattern of antagonism toward Chinese exporters and should be disregarded as redundant.

Echeng appreciates the Commission's thorough and impartial conduct of this review and looks forward to the final report affirming the preliminary findings in SEF 676.

Yours sincerely,

John Bracic