



Australian Government
Department of Industry,
Science and Resources

Anti-Dumping
Commission

Australian industry verification report

Verification and case details

Initiation date	30/06/2025	ADN	2025/053
Case number	679		
The goods under consideration	Light Gauge Steel Stud and Track		
Case type	Dumping and Subsidy Investigation		
Australian industry	Rondo Building Services Pty Limited		
Location	57-87 Lockwood Road, Erskine Park NSW 2759		
Verification from	18/11/2025	to	18/11/2025
Investigation period	1/04/2024	to	31/03/2025

The Anti-Dumping Commission will review this report, including its views and recommendations.

This report may not reflect the Anti-Dumping Commission's final position.

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1 Introduction

Rondo Building Services Pty Ltd (Rondo) provided data to the Anti-Dumping Commission (the commission) in relation to Dumping and Subsidy Investigation 679 (case No. 679) into Light Gauge Steel Stud and Track (LGST, or the goods) exported to Australia from the People's Republic of China (China).

A verification team (the team) has verified whether the data Rondo submitted is complete, relevant and accurate for use in case 679. [Anti-Dumping Notice \(ADN\) 2016/30](#) describes the commission's verification procedure.

This report explains the team's key findings, including the evidence considered and material issues identified. Where Rondo or the team materially revised the submitted data, this report outlines the nature, extent and outcomes of these revisions.

The commission prepared this report to publish on the electronic public record for case 679.

The commission is authorised to conduct verifications under sections 269SMG and 269SMR of the *Customs Act 1901* (Cth) (the Act).¹

¹ All legal citations in this report are to the Act unless otherwise stated.

2 Company background

2.1 Corporate structure and ownership

Rondo has operated in Australia for over 60 years, with factories located in New South Wales, Queensland and New Zealand. It is a private company that is a 50:50 joint venture owned by CSR Investments Pty Ltd (CSR) and Knauf Gypsum Pty Ltd (Knauf). Rondo manufactures and supplies light gauge steel stud and track to the building industry, primarily in Australia.

Rondo's two shareholders, CSR and Knauf, are also Rondo's major customers. However, Rondo operates as a standalone company that is independent of its shareholders.

2.2 Related parties

The team examined the relationships between Rondo and parties involved in the production and sale of the goods.

2.2.1 Related customers

The team found that Rondo sold goods to related customers during the period of investigation but did not find any evidence that these sales were non-arm's length transactions.

3 Like goods manufactured in Australia

3.1 Manufacturing in Australia

Rondo manufactures LGST at its production facility in Erskine Park, New South Wales.

In its application, Rondo identified two other Australian manufacturers of LGST being Etex Australia (Etex, branded Siniat) and Studco Building Systems (Studco). The verification team is satisfied that the Australian industry producing like goods consists of these manufacturers.

3.1.1 Production process

Rondo operates 30 roll-forming machines across its manufacturing facilities with each machine generally dedicated to a single product line. This approach minimises the need for roll set changes, ensuring consistent production efficiency.

A LGST is a cold-formed product, further worked from either zinc coated (galvanised) steel or aluminium zinc coated steel as the raw material (including all variants thereof, for example whether or not containing magnesium or other alloys).

The steel is typically sourced in coils or sheets from an Australian manufacturer and from import sources.

Steel coils or sheets are first cut into appropriate lengths based on the desired dimensions of the LGST using shearing machines or other cutting equipment. They are then shaped into the required profile. This involves roll forming, where the steel is bent and moulded into the required shape.

Holes or perforations may be punched along the length of the LGST to facilitate attachment to the wall and for cables and wires to pass through.

Once LGST have been manufactured and pass Rondo's quality control checks, the finished goods are packed for protection during storage. They are then shipped to Australian distributors, construction sites, or other end users such as contractors.

3.2 Model control codes

The sales and costs data of Rondo submitted complies with the model control code (MCC) structure detailed in ADN 2025/053.

Category	Sub-category	Identifier	Sales data	Cost data
Stud / Track	Stud	S	Mandatory	Mandatory
	Track	T		
Coating type	Zinc coated	Z	Mandatory	Mandatory
	Zinc Aluminum coated	ZA		
	Zinc Magnesium coated	ZM		
	Aluminum Zinc coated	AZ		

Category	Sub-category	Identifier	Sales data	Cost data
	Aluminum Zinc Magnesium coated	AM		
	Other	B		
Coating mass	$\leq 100 \text{ g/m}^2$	1	Mandatory	Mandatory
	$> 100 \text{ g/m}^2 - \leq 200 \text{ g/m}^2$	2		
	$> 200 \text{ g/m}^2 - \leq 300 \text{ g/m}^2$	3		
	$> 300 \text{ g/m}^2$	4		
Base Metal Thickness (BMT)	$\leq 0.45\text{mm}$	1	Mandatory	Mandatory
	$> 0.45\text{mm} - \leq 0.55\text{mm}$	2		
	$> 0.55\text{mm} - \leq 0.69\text{mm}$	3		
Width	$\leq 51 \text{ mm}$	A	Mandatory	Mandatory
	$> 51 \text{ mm} - \leq 66 \text{ mm}$	B		
	$> 66 \text{ mm} - \leq 81 \text{ mm}$	C		
	$> 81 \text{ mm} - \leq 100 \text{ mm}$	D		
	$> 100 \text{ mm} - \leq 170 \text{ mm}$	E		
Height	$\leq 51 \text{ mm}$	A	Mandatory	Mandatory
	$> 51 \text{ mm} - \leq 66 \text{ mm}$	B		
	$> 66 \text{ mm} - \leq 81 \text{ mm}$	C		
	$> 81 \text{ mm} - \leq 100 \text{ mm}$	D		
	$> 100 \text{ mm} - \leq 170 \text{ mm}$	E		

3.2.1 Amendments to model control codes

After comparing prices of different models of the goods, the verification team does not recommend amending the MCC structure.

3.3 Verification of model control codes

Error! Reference source not found.1 provides detail on the model control code (MCC) sub-categories that were determined and verified to source documents.

Category	Determination of the sub-category
Stud / Track	MCC sub-categories were reconciled to: <ul style="list-style-type: none"> Product code information Commercial invoices Despatch/delivery advice
Coating type	
Coating mass	
Base Metal Thickness (BMT)	
Width	
Height	

Table 1 – MCC sub-category determination

3.4 Like goods

Like goods are defined under section 269T(1) of the Act as:

goods that are identical in all respects to the goods under consideration or that, although not alike in all respects to the goods under consideration, have characteristics closely resembling those of the goods under consideration.

The verification team considers that LGST manufactured by Rondo are identical to, or have characteristics closely resembling, the goods exported to Australia for the reasons detailed below.

- **Physical likeness:** Rondo-manufactured LGST are alike in physical appearance to the imported goods.
- **Production likeness:** LGST produced in Australia are manufactured in a similar manner to the imported goods. Liquid steel is cast into flat rolled steel, which is then metallic coated, then roll-formed to produce the required LGST.
- **Commercial likeness:** The locally produced LGST compete directly with imported LGST in the Australian market.
- **Functional likeness:** The imported and Australian-produced LGST are used interchangeably in the same or comparable end-uses.

3.5 List of all model control codes

Rondo produced and sold goods with the following MCCs during the investigation period:

Rondo Australian sales MCC
S-Z-3-2-A-A
S-Z-3-2-B-A
S-Z-3-2-B-B
S-Z-3-2-C-A
S-Z-3-2-D-A
S-Z-3-2-E-A
T-Z-3-2-A-A
T-Z-3-2-B-A

Rondo Australian sales MCC
S-Z-3-2-A-A
T-Z-3-2-C-A
T-Z-3-2-D-A

Table 2 List of MCCs sold during investigation period

3.6 Like goods assessment

The verification team is satisfied that:

- LGST produced by Rondo are like to the goods² imported from China
- at least one substantial process of manufacture of LGST is carried out in Australia³
- the like goods were, therefore, wholly or partly manufactured in Australia by Rondo⁴
- there is an Australian industry, consisting of Rondo, Studco and Etex, which produce like goods in Australia.⁵

² Section 269T(1) (definition of 'like goods').

³ Section 269T(3).

⁴ Section 269T(2).

⁵ Section 269T(4).

4 Australian market

4.1 Australian market background

The Australian LGST market is supplied by Rondo and two other Australian producers (Etex and Studco) who manufacture and distribute the goods to the Australian market. Other suppliers are importers predominantly from China which include companies such as Intex, Hume, ABC, Castle, and RL.

At the visit, Rondo indicated that customs import data for the goods is limited due to the nature of the product. However, Rondo's estimates that more than 90 per cent of imported goods originate from China, with only minor volumes sourced from other countries. Furthermore, through customer interactions, Rondo claims that other countries of origin for the goods are rarely mentioned, reinforcing China's dominant position in the supply chain.

4.2 Australian market structure

4.2.1 Marketing segmentation and end uses

LGST is primarily used in commercial and residential construction in Australia. LGST are used in many markets, including installation in medium to high density residential buildings, due to the preferred construction methods of builders and contractors in erecting walls.

Resellers purchase LGST to sell alongside plasterboard, while plasterers install the goods and attach plasterboard to create walls in residential and commercial buildings, schools, hospitals and apartments.

Substitutes: The main substitutable product to LGST are medium to heavy gauge steel studs, typically in the BMT range of $\geq 0.69\text{mm}$ to $\leq 1.5\text{mm}$. For example, a LGST can be substituted for 0.75mm BMT product, however it is heavier and more costly. Timber can also be used as a substitute for certain low/medium density residential construction.

4.2.2 Supply and distribution arrangements

Australian manufactured LGST are sold either to trade store distributors or directly to product installers (contractors). Rondo distributes its goods via a network of distributors located in New South Wales, Victoria, Queensland, South Australia and Western Australia with a percentage supplied directly to contractors.

In its application, Rondo stated that trade store distributors can source imported finished steel products either directly from overseas manufacturers or from importers who source the goods from overseas. These local importers also supply products directly to contractors.

Some contractors typically work on larger, more complex projects such as multi-level office buildings or hospitals, schools and retail buildings while other contractors are involved in medium to smaller construction projects. The distribution arrangements are depicted below:

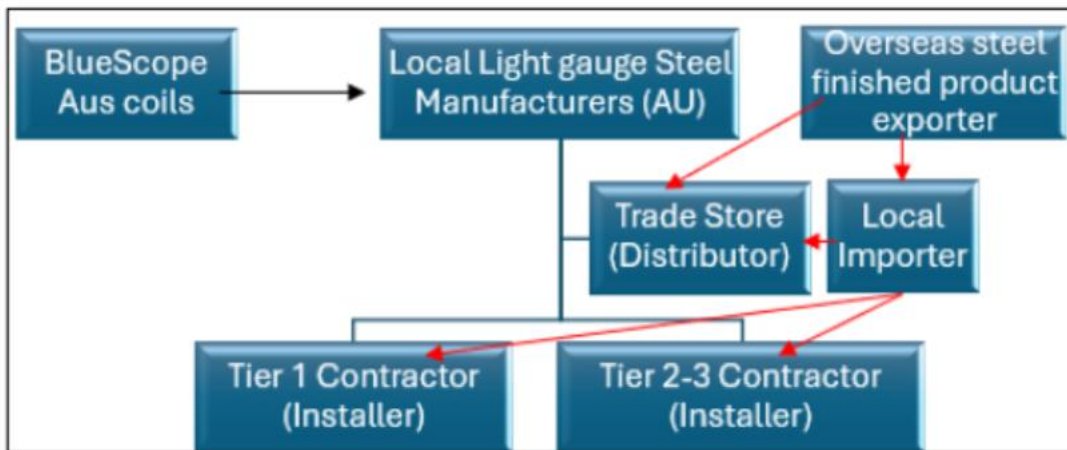


Figure 1 – Marketing and distribution arrangements⁶

Market segments and distribution agreements are:

- Rondo distributes through Distributors, and directly to Contractors
- Siniat distributes through aligned Distributors and directly to Contractors
- Studco distributes directly to Contractors and through Distributors
- Intex distributes directly to Contractors and through Distributors
- Hume & BM Sydney are Distributors of Rondo products who also import products (dual stock)

4.2.3 Demand

Factors contributing to overall market demand include:

- Government housing incentives such as first homeowner and stamp duty grants;
- Australian population growth and housing requirements (including migration levels);
- Changes to Australian Standards and the National Construction Code;
- Interest rates impacting borrowing for new home builds and investment trends; and
- Availability of trades to complete construction pipeline.

4.3 Australian market pricing

Rondo negotiates pricing directly with its customers on an individual customer basis. The prices are set based on a range of factors. Typically, Rondo will provide the customer with a price list with its recommended retail price and then negotiate discounts and rebates.

4.4 Australian market size

The verification team has estimated the size of the Australian market for LGST using the domestic sales data from Rondo and data sourced from the Australian Border Force (ABF) import database. The information sourced from the ABF import database was determined using the relevant tariff subheadings and statistical codes for LGST and additional filtering to remove imports that were not considered to be the

⁶ [EPR 679 - Document 1](#)

goods. However, these tariff classifications likely include many other products not covered by the goods description.

Figure 2 depicts the verification team's estimate of the Australian market size for LGST from 1 April 2021 to 31 March 2025.

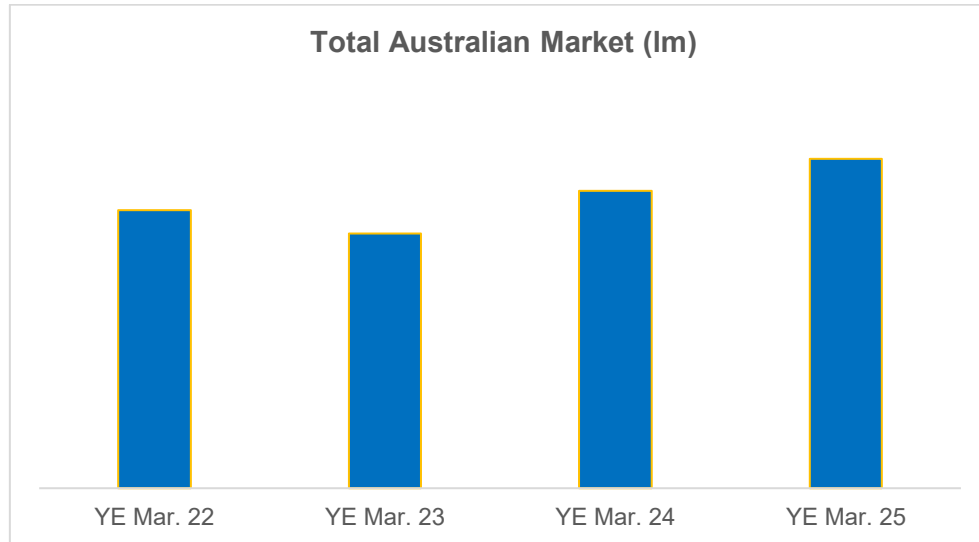


Figure 2: Australian market for the goods (lm)

Figure 2 depicts that the demand for LGST, after slightly dipping in year ending (YE) March 2023, has consistently increased over the injury analysis period. In YE March 2025, the market for LGST was approximately 50 million lineal meters (lm). The commission will further examine the size of the Australian market during the course of the investigation, based on verified data obtained from interested parties and the ABF.

5 Verification of sales completeness and relevance

The commission typically verifies sales as complete and relevant by reconciling the revenue and quantity in sales listings up to management accounts and then audited financial accounts. ADN 2016/30 further describes this verification process. The team verified whether the sales listings Rondo submitted are complete and relevant by reconciling them to the audited financial statements, consistent with ADN 2016/30.

The team verified the relevance and completeness of the sales data as follows:

1. Reconciled the total sales revenue for FY2024 in Rondo's audited financial statement to its accounting system.
2. Reconciled the total sales revenue for the investigation period to the trial balance.
3. Observed how Rondo filtered out exported goods and goods that are not like goods from the sales listing in its accounting system in order to replicate the Australian sales listing.
4. Reconciled the total sales revenue in Rondo's accounting system to a listing of all sales in the investigation period.

The team identified the issues outlined below during this process. Details of this verification process are contained in the verification work program and its relevant attachments, at **Confidential Attachment 1**.

5.1 Sales completeness and relevance exceptions

Exception 1: Exceptions during verification of completeness and relevance of sales data

Description: The verification team reviewed Rondo's sample invoices and noted several of the settlement reports, payment terms and payment amounts did not reconcile.

Resolution: Rondo provided an updated breakdown of the settlement reports that matched the payment amounts and payment terms.

5.2 Import sales by company

LGST are manufactured primarily using Australian inputs. Rondo imports some of its raw steel feed from non-subject countries.

5.3 Export sales by company

Rondo exported LGST during the period of investigation. The team verified this information as part of the upwards sales verification. A small number of export sales made to Australian customers were included in the Australian sales listing; however, the team considers that the volume is negligible and immaterial to the investigation.

The team has not included export sales in its Australian market analysis and assessment of material injury.

5.4 Sales completeness and relevance finding

The team is satisfied that the sales data submitted by Rondo is complete and relevant.

6 Verification of sales accuracy

The commission typically verifies sales as accurate by reconciling a selection of volume, revenue and other key data in the sales listings down to source documents. ADN 2016/30 further describes this verification process.

The team verified whether the export and domestic sales listings Rondo submitted are accurate by reconciling them to source documents, consistent with ADN 2016/30.

The team did not identify any issues. The team detailed this process in the verification work program and its relevant attachments in **Confidential Attachment 1**.

6.1 Sales accuracy exceptions

Exception 2: Exceptions during verification of accuracy of sales data

Description: Rondo could not reconcile A4 sales data to the profit and loss statement as the profit and loss statement included medium and heavy gauge steel stud and track.

Resolution: Rondo explained that its accounting system is used to split the goods into a line-by-line invoice but cannot reconcile to the profit and loss statement. The verification team was able to reconcile the goods to the general ledger accounts and to the Profit and Loss statement at aggregate level.

6.2 Related party customers

The verification team observed that Rondo sold like goods to related customers who are also Rondo's shareholders.

The team analysed the prices for unrelated and related customers and did not find evidence of price discrimination between related and unrelated customers and consider the sales to related customers to be arm's length.

The team is satisfied that Rondo's selling prices of the goods to related customers can be relied upon in the assessment of the economic condition of the Australian industry.

6.3 Sales accuracy finding

The team is satisfied that the sales data Rondo submitted is complete and relevant. Details of this verification process are contained in the verification work program and its relevant attachments, at **Confidential Attachment 1**.

7 Verification of CTMS completeness and relevance

The commission typically verifies cost to make and sell (CTMS) as complete and relevant by reconciling the total cost to make (CTM) and selling, general and administrative (SG&A) expenses in cost listings up to management accounts and then audited financial accounts. ADN 2016/30 further describes this verification process.

The team verified whether the CTM and SG&A listings Rondo submitted are complete and relevant by reconciling it to audited financial statements, consistent with ADN 2016/30.

The team verified the relevance and completeness of the cost data as follows:

1. Reconciled the cost of goods sold for the 2024 financial year to the audited financial statements and trial balance.
2. Reconciled the cost of goods sold for the period to the trial balance.
3. Reconciled cost of goods sold to the total company cost to make for the period.
4. Reviewed the categorisation of the cost to make of the goods and non-goods.
5. Reconciled the cost to make of the goods to the cost spreadsheets.

The team did not identify any issues during this process. Details of this verification process are contained in the verification work program and its relevant attachments, at **Confidential Attachment 1**.

7.1 CTMS completeness and relevance finding

The team is satisfied that the CTMS data provided in the application by Rondo is complete and relevant.

8 Verification of cost to make and sell accuracy

The commission typically verifies CTMS as accurate by reconciling a selection of volume, cost and other key data in the CTM and SG&A listings down to source documents. ADN 2016/30 further describes this verification process.

The team verified whether the CTM and SG&A listings Rondo submitted are accurate by reconciling them to source documents, consistent with ADN 2016/30.

Given that the raw materials used to produce LGST are same as those used for steel corner beads and angles (case 677), which is being concurrently investigated by the commission, the verification team largely relied on 677 verified cost information and only conducted targeted verifications.

The team did not identify any issues. The team detailed this process in the verification work program and its relevant attachments in **Confidential Attachment 1**

8.1 Cost to make and sell accuracy exceptions

As explained above, the verification team did not identify any issues with the cost to make and sell data submitted by Rondo.

8.2 Cost allocation method

Table 3 outlines how the team allocated each cost component.

Cost component	Method applied
Raw materials	Rondo allocates raw material costs based on production quantity.
Scrap offset	As per scrap report (minor scrap mainly due to punching of holes).
Direct labour	Rondo allocated labour costs based on production quantity.
Manufacturing overheads	Allocated based on weight.
Depreciation	Allocated based on weight.
Variance	Rondo runs a standard cost costing system, producing a standard cost variance analysis at year's end. There was a small annual variance across all production which the team considered immaterial once applied to the unit cost of the goods.

Table 3: Cost allocation method

8.3 Related party suppliers

The verification team did not identify any related suppliers.

8.4 Cost to make and sell accuracy finding

The team is satisfied that the CTMS data Rondo submitted is accurate and reasonably reflects the costs associated with the manufacture and sale of the goods.

9 Economic condition

9.1 Applicant's injury claims

In its application for a dumping and subsidy investigation, Rondo claimed that the Australian industry has experienced injury in the form of:

- lost sales volume
- lower production volumes
- price suppression
- price depression
- loss of profits
- loss of profitability
- decline in asset values
- lower revenue
- reduced return on investment
- reduced capacity utilisation
- reduced productivity.

Rondo alleges that the material injury in its various forms and arising from the volume and price effects of the dumped goods from China, has transpired across the full injury analysis and investigation periods (the years ending 1 April 2021 through to 31 March 2025)

9.2 Approach to injury analysis

The analysis detailed in this chapter is based on verified financial information submitted by Rondo, and data from the ABF import database. The team has assessed the economic condition of the Australian industry from 1 April 2021 is at **Confidential Attachment 2**.

A summary of the verification team's assessment of injury claims is discussed in the following sections.

9.3 Volume effects

9.3.1 Sales volume

Figure 3 shows the Australian industry's sales volume over the injury analysis period.

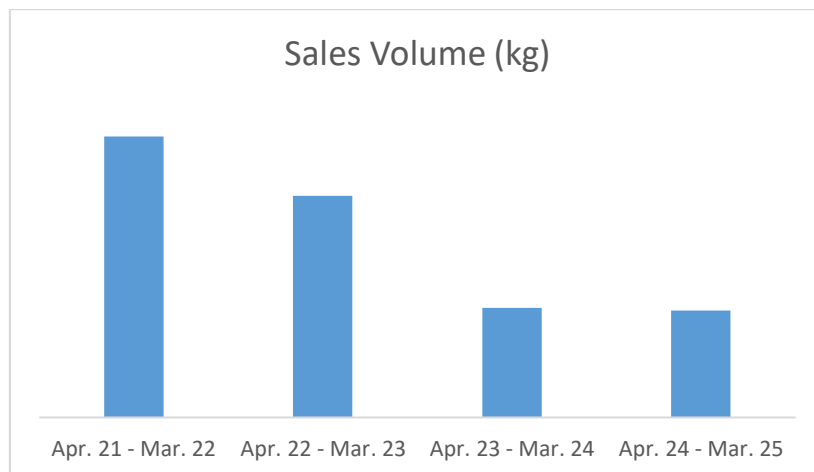


Figure 3: Australian industry sales volume over the injury analysis period

Based on this analysis, the team considers that Rondo has experienced injury in the form of loss of sales volume over the injury analysis period.

Figure 4 shows that the Australian industry production volume has consistently declined across the injury analysis period. After declining sharply in YE March 2024, the production volume stabilised, which illustrates direct correlation with the sales volume trend of the Australian industry.

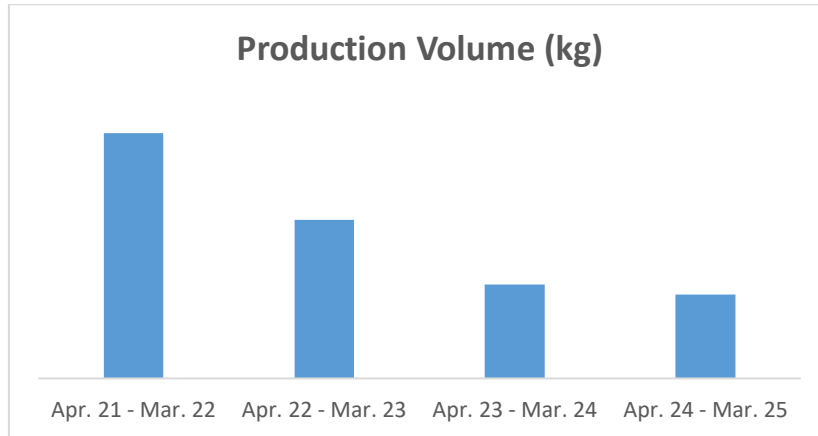


Figure 4: Australian industry production volume over the injury analysis period

Based on this analysis, the verification team considers that Rondo has experienced injury in the form of lower production volumes over the injury analysis period.

9.3.2 Market share

Figure 5 shows the relative market share of the Australian industry, imports of like goods from China and imports from all other countries over the injury analysis period.

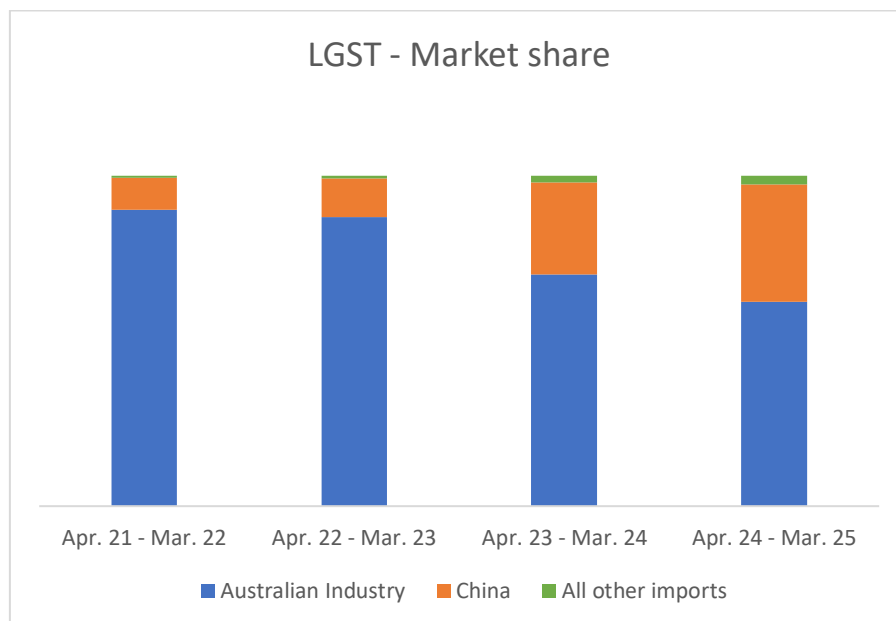


Figure 5: Relative market share of the Australian industry and import sources (%)

Figure 5 illustrates that the Australian industry market share commenced declining from April 2021, with a further decline in the period April 2023 to March 2024. During the same period,

there has been an increase in market share for the goods, with imports from China displacing the Australian industry's market share.

Based on this analysis, the team considers that Rondo has experienced injury in the form of reduced market share over the injury analysis period.

9.4 Price effects

Price depression occurs when a company, for some reason, lowers its prices. Price suppression occurs when price increases, which otherwise would have occurred, have been prevented. An indicator of price suppression may be the margin between prices and costs.

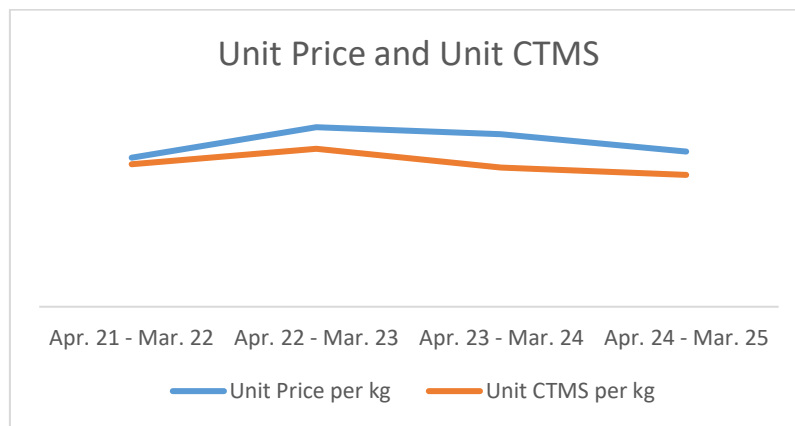


Figure 6: Unit revenue and unit CTMS (AUD/kg) over the injury analysis period

Figure 6 shows unit price is consistently greater than the unit costs to make and sell (CTMS) over the injury analysis period. It is noted that after peaking in the YE March 2023, unit revenue started declining, narrowing the difference between unit revenue and unit costs. The narrowing of the difference during YE March 2025 period indicates price depression.

The team analysed weighted average quarterly price effects over the injury analysis period as shown in Figure 7.

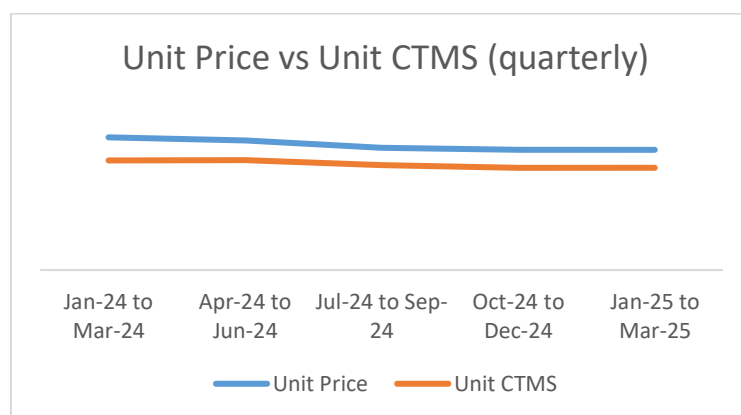


Figure 7: Unit revenue and unit CTMS by quarter (AUD/kg)

Figure 7 illustrates quarterly analysis unit price and unit costs over the investigation period. It further supports the Australian industry's claim the narrowing gap between unit price and unit CTMS. This suggests that the Australian industry suffered injury in the form of price depression and price suppression during the proposed investigation period.

Based on this analysis, the team considers that Rondo as experienced injury in the form of price suppression and price depression over the injury analysis period.

9.5 Profit and profitability

Rondo claims that it has suffered injury in the form of reduced profits and profitability primarily due to both lower prices and increased fixed costs.

Rondo claims the relatively high fixed costs required to produce the like goods, together with the loss of sales volume resulted in fixed costs being higher on a unit basis than they otherwise would have been. This resulted in Australian industry's reduced profitability as illustrated in Figure 8 below.

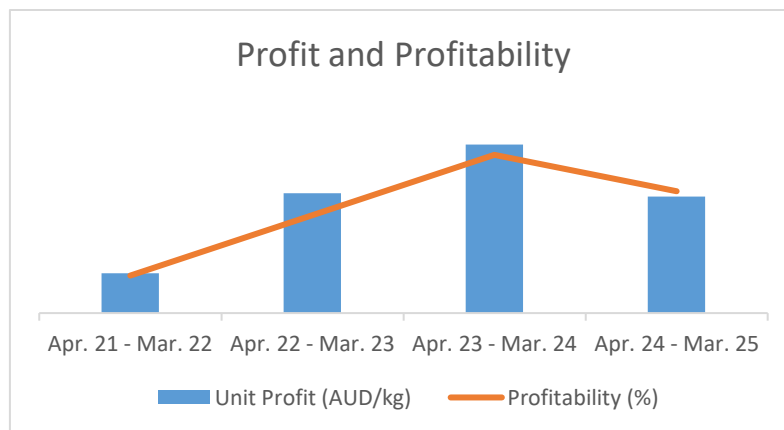


Figure 8: Unit profit and profitability over the injury analysis period

Figure 8 illustrates the applicant's unit profit and profitability. After reaching its peak in the YE March 24, the applicant's profit and profitability dropped significantly.

Based on this analysis, the team considers that Rondo has experienced injury in the form of loss of profits and reduced profitability over the injury analysis period.

9.6 Other economic factors

As part of its application, Rondo provided data for the period covering financial years 2021 to 2025 in relation to a range of other economic factors that may also be indicative of injury to the Australian industry. Rondo claims that it has experienced material injury in the form of:

- decline in asset values
- lower revenue
- reduced return on investment
- reduced capacity utilisation
- reduced productivity

9.6.1 Assets

Rondo claims that it has experienced a decline in asset values over the injury analysis period.

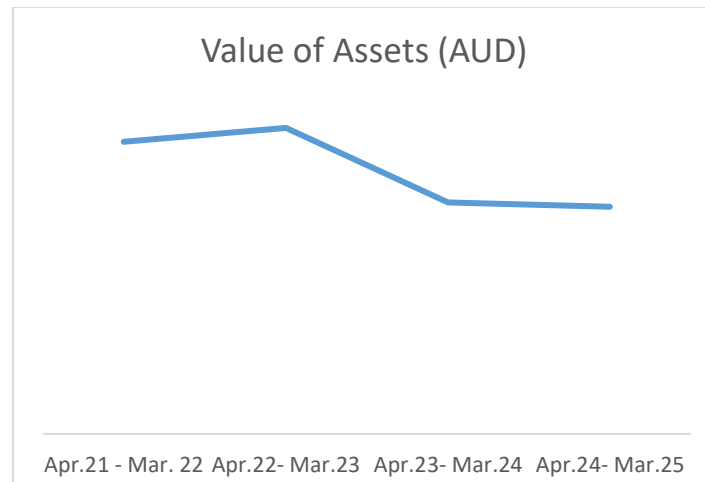


Figure 9: Australian industry value of assets in relation to like goods

Figure 9 illustrates that asset value, after slightly increasing in the YE March 2023 from YE March 2022, decreased the following year and remained low in the YE March 2025.

The team considers that this supports Rondo's claim that it has suffered a decline in the value of its assets.

9.6.2 Revenue

Figure 10 shows that after peaking its revenue in YE March 2023, there has been a steady decline of revenue all throughout the injury analysis period.

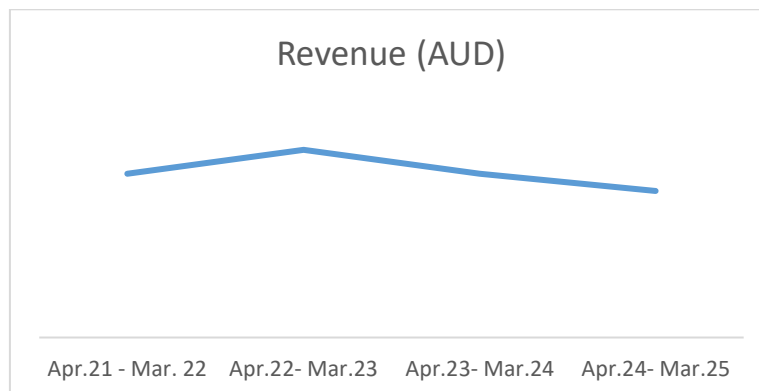


Figure 10: Australian industry revenue in relation to like goods

The team considers that this supports Rondo's claim that it has suffered a decline in revenue over the injury analysis period.

9.6.3 Return on investment

Figure 11 shows a sharp increase in ROI in YE March 2023 from YE March 2022, then a decline throughout the remainder of the injury analysis period.

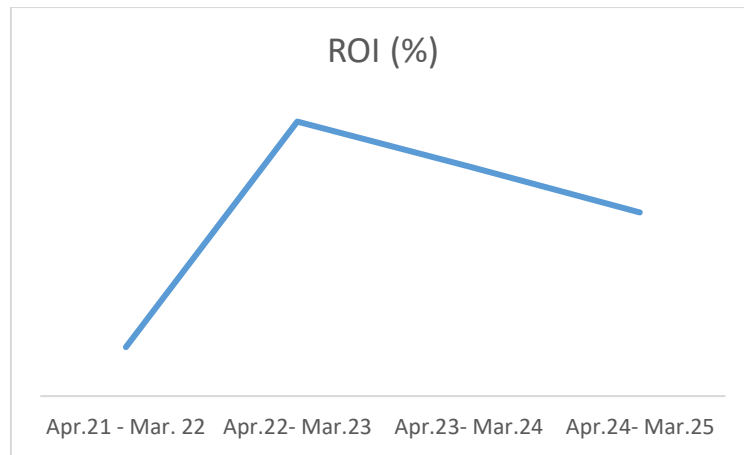


Figure 11: Return on investment

The team considers that this supports Rondo's claim that it has suffered a decline in return of investment over the injury analysis period.

9.6.4 Capacity utilisation

The applicant claimed that it's capacity utilisation declined over the proposed investigation period.

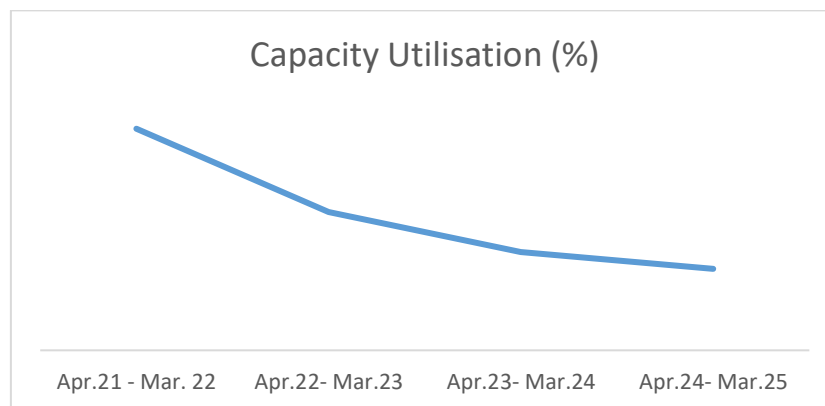


Figure 12: Australian industry capacity utilisation of like goods

Figure 12 illustrates an overall year on year consistent decline on capacity utilisation from YE April 2021 to YE March 2025.

9.6.5 Productivity

Rondo claims that its productivity declined over the proposed investigation period.

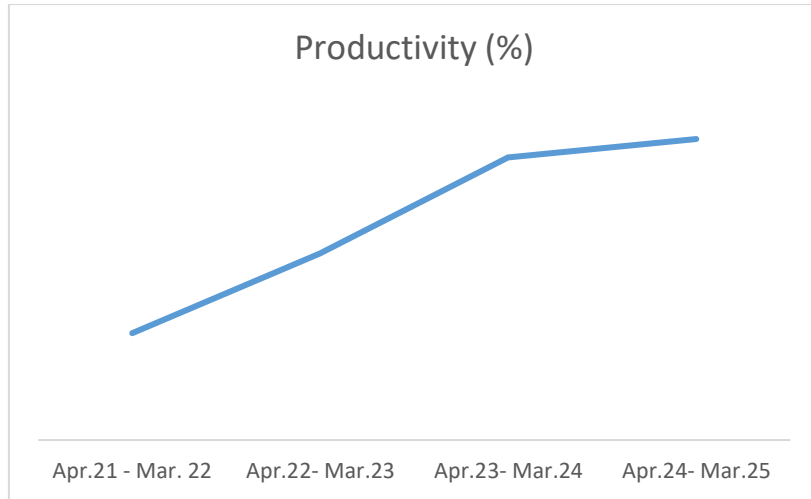


Figure 13: Australian industry's productivity

Figure 13 illustrates steady growth in productivity from YE March 2021 to YE March 2024, with a slower rate of growth in the final year of the injury analysis period.

9.7 Conclusion

Based on an analysis of the information contained in the application and obtained and verified during our visit, the team considers that Rondo has experienced injury in the form of:

- lost sales volume
- lower production volumes
- price suppression
- price depression
- loss of profits
- loss of profitability
- decline in asset values
- reduced capital investment
- reduced return on investment
- reduced capacity utilisation
- reduced productivity

10 Causal link claims

10.1 Background and approach to analysis

Under section 269TG, one of the matters that the Minister must be satisfied of in order to publish a dumping duty notice is that material injury to an Australian industry producing like goods has been or is being caused or is threatened.

The team discussed with Rondo whether the alleged dumping and subsidisation of imported goods can be demonstrated to be causing material injury to the Australian industry and collected evidence to support those claims. The commission will consider further evidence during the course of the investigation.

The team also examined factors other than dumping and subsidisation to consider whether these may be causing injury.

10.2 Injury during the investigation period

The verification team discussed the claims of material injury which were relevant to Rondo. In its application and during verification, Rondo noted that it is facing increasing competition from cheaper Chinese imports of LGST.

Rondo has responded by lowering its prices in order to compete against cheap Chinese imports. In addition to the evidence already provided in its application, the verification team requested further evidence to demonstrate Rondo's internal processes and efforts to directly respond to an increase in import competition. This was provided by Rondo following verification and included evidence of price reductions for certain customers on certain products and the financial impacts on Rondo as a result of price changes.

The team noted that Rondo takes both a proactive and reactive approach to pricing adjustments when faced with pricing competition in the market.

The commission will continue to examine Rondo's claims of material injury and the evidence provided during the course of the investigation.

10.3 Injury caused by factors other than dumping and subsidisation

Rondo did not identify any factor other than dumped and subsidised goods from China causing injury to the Australian Industry. Rondo claims that the material injury caused to the Australian industry is by the dumped and subsidised imports from China and is greater than that likely to occur in the normal ebb and flow of business.

Rondo claims that it lost substantial market share when demand for the goods has generally increased across the injury analysis period. Rondo asserts that it has experienced price suppression and price depression over the injury analysis period alongside declines in revenue. These factors have adversely impacted on the applicant's profits and profitability.

The commission will further assess other potential causes of injury to the Australian industry during the course of the investigation.

11 Appendices and attachments

Confidential attachment 1	Verification work program
Confidential attachment 2	Economic condition of the Australian industry