

Anti-Dumping Commission
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PUBLIC RECORD

Dear Sirs,

Re: Investigation 659 - Certain strata steel bolts from China; Submission of Comments on Preliminary Affirmative Determination; Our client: Huanghua Tanrimine Metal Support Co., Ltd. (“Tanrimine”)

Huanghua Tanrimine Metal Support Co., Ltd. (“Tanrimine”) has reviewed the Commission’s preliminary affirmative determination published through Anti-Dumping Notice No 2025/129 (“PAD 659”) dated 23 December 2025 as well as attached spreadsheets, and provides the following comments in response.

I. The Commission errors in calculating the profit margin

We note that the Commission calculated the profit margin used in constructing the normal value in Worksheet (e) Profit in Appendix 3. The cost of production for the product “[CONFIDENTIAL TEXT DELETED – Product type]” used was the original cost of production accounted in Tanrimine’s financial system. However, according to the instruction from the Commission’s verification team, Tanrimine made a revision on the cost of production for all the friction bolts and submitted as Item 58&74&81&86&93&101 of the verification exhibits which is Excel “Cost allocation worksheet for POI updated version for Item 25 20250826”. From the worksheet of Cost Allocation Worksheet for May 2024, Tanrimine hereby revises the cost of production for the product “[CONFIDENTIAL TEXT DELETED – Product type]” in the updated Worksheet (e) Profit in Appendix 3 [CONFIDENTIAL APPENDIX]. The unit cost of production of the product “[CONFIDENTIAL TEXT DELETED – Product type]” shall be [CONFIDENTIAL TEXT DELETED – Unit cost of production] CNY/PC, instead of [CONFIDENTIAL TEXT DELETED – Unit cost of production] CNY/PC which is currently used by the Commission in the Worksheet (e) profit

of Appendix 3 Tanrimine Normal Value as Unit cost of sale (ADC). Accordingly, the profit margin used in constructing the normal value shall be **[CONFIDENTIAL TEXT DELETED – Profit margin]** as shown in the updated Worksheet (e) Profit in Appendix 3 **[CONFIDENTIAL APPENDIX]**.

Therefore, Tanrimine requests the Commission to revise relevant worksheet for calculating the dumping margin using the right profit margin as the updated Appendix 4 **[CONFIDENTIAL APPENDIX]**.

II. The Commission errors in determining the PMS in this investigation

The Commission preliminarily determines that a particular market situation (PMS) exists in the Chinese strata steel bolt market because of the preliminary determination on another investigation on steel hot rolled coil (HRC) exported to Australia from China (Investigation 658). We do not agree with the determination logic on the existence of a PMS due to the following reasons:

Firstly, the present case is not identical or similar to Investigation 658. In the Investigation 658, the Commission considers “The GOC’s involvement in the markets for raw materials used in the production of steel”(see A6 SEF 658 – Hot rolled coil steel – China). Therefore, similarly, in this case, the Commission shall consider “The GOC’s involvement in the markets for raw materials used in the production of **steel bolts** instead of steel”. Apparently, the raw materials of steel are iron ore, coke, coal, scrap steel, etc, while the raw materials for **steel bolts** are steel coil. The PMS in upstream market does not guarantee the downstream market is distorted. The burden of proof is on the shoulder of the Commission to show with positive evidence in each individual case to prove the existing of PMS. Nevertheless, we failed to see any evidence so far.

Secondly it is apparent that the market of steel hot rolled coils and the market of strata steel bolts have large differences. The main manufacturer of the steel hot rolled coils are large state-owned companies, while the main manufacturer of the strata steel bolts are normally private companies with small size. The suppliers of the raw materials are also different. Tanrimine purchased the raw materials all from private companies.

Thus, the Commission shall not make the determination on the PMS without making analysis on the market of the product under consideration but just making reference to the market of the raw material. The Commission shall use Tanrimine’s own cost records on the raw materials to construct the normal value.

III. Conclusion

For the above reasons, we consider that the dumping margin for Tanrimine is overstated. We

respectfully request that the Commission correct the normal value calculation.

The Commission is kindly requested to consider our above comments when making the Statement of Essential Facts and the Final Determination. Should the Commission have any further questions, we are pleased to provide any clarifications.

Sincerely yours,

Jiang Liyong
Partner
Gaopeng & Partners
On behalf of
Huanghua Tanrimine Metal Support Co., Ltd.