

13 February 2026

Anti-Dumping Commission
Investigations 2
GPO Box 1632
Melbourne Victoria 3001

Email: investigations2@adcommission.gov.au

Public File

Dear Director,

Investigation No. 659 concerning Certain Strata Steel Bolts (friction bolts) exported from China

Jennmar Australia Pty Ltd (**Jennmar**), as a member of the Australian industry producing like goods to the goods the subject of this investigation (**INV 659**), provides the following submission to assist the Anti-Dumping Commission's (**the Commission's**) understanding of the related party relationships known to exist between Chinese exporters and Australian importers of the goods under consideration.

PAD Findings and Related Party Arrangements

In respect of the Chinese exporter Huanghua Tanrimine Metal Support Co., Ltd (**Tanrimine**), PAD 659 has found that:¹

Arms length assessment

Based on the information that the commission attained from Tanrimine, the commission preliminarily finds, in accordance with section 269TAA, there is no evidence that:

- *there was any consideration payable for, or in respect of, the goods other than its price, or*
- *the price was influenced by a commercial or other relationship between the buyer, or an associate of the buyer, and the seller, or an associate of the seller, or*
- *the buyer, or an associate of the buyer, was directly or indirectly, reimbursed, compensated or otherwise received a benefit for, or in respect of, whole or any part of the price.*

Accordingly, the commission is preliminarily satisfied that Tanrimine's customer in Australia's purchases from Tanrimine were made in 'arms length' transactions as defined in section 269TAA. Noting these findings, the commission has calculated an export price of the goods exported by Tanrimine to Australia from China under section 269TAB(1)(a). The export price was calculated as the price paid by the importer to the exporter for the goods, less any charges or expenses in respect of the transport of the goods after exportation.

¹ PAD 659, section 2.2.3, p. 8.

The commission's preliminary findings regarding Tanrimine's circumstances of exportation, including arms length assessment, are at Confidential Attachment 4.

For the purposes of further informing the Commission's assessment of Confidential Attachment 4, Jennmar provides at Confidential Attachment 1 its understanding of the parties and ownership structures within the Tanrimine supply chain. In short, Jennmar is of the view that the corporate arrangements between the Chinese exporter and the Australian importer may have the effect of influencing price and are therefore directly relevant to the Commission's arms-length assessment.

Jennmar therefore requests that the Commission give due consideration to these matters prior to the publication of the *Statement of Essential Facts*.

If you have any questions concerning this submission, please do not hesitate to contact the Australian industry representative Mr Chad Uphill on +61 (0) 412 377 603.

FOR AND ON BEHALF OF

Jennmar Australia Pty Ltd

AN AUSTRALIAN INDUSTRY APPLICANT