



Beijing, China
26 March 2026

To: Anti-Dumping Commission

Re: STATEMENT OF ESSENTIAL FACTS NO. 659 ALLEGED DUMPING OF STRATA STEEL BOLTS EXPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA AND ALLEGED SUBSIDISATION OF STRATA STEEL BOLTS EXPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA

Comment on the Statement of Essential Facts No. 659

Dear Sir, / Dear Madam,

This comment is submitted on behalf of Sandvik (Jining) Rocabolt Technologies China Co., Ltd. ("**Sandvik Jining**"). We refer to the Statement of Essential Facts No. 659 on alleged dumping of strata steel bolts exported from the People's Republic of China and alleged subsidization of strata steel bolts exported from the People's Republic of China ("**SEF**") published on 6 March 2026 and the Confidential Attachment 15 ("**Attachment 15**") sent to us on 18 March 2026. The SEF provides opportunities for interested parties to submit comments on the SEF within 20 days of the publication of the SEF, i.e., until 26 March 2026.

Upon careful analysis of the SEF and the Attachment 15, we respectfully request the Commission's correction and re-consideration on calculation of the subsidy margin for Sandvik Jining, which will be specified in below parts.

1. Outdated data used in calculation

1.1. Export value and volume of goods to Australia

In the Attachment 15, the Value/volume of the goods (i.e., total export value of the goods under consideration to Australia) and the total export volume of the goods (PCS) in sheet (a) Subsidy Calculation used the Commission are [export value] and [export quantity] respectively. However, those two figures are not the current versions. Those two figures are provided in table B-2 Australian sales listing in Sandvik Jining's initial submission, which reconciled to the company's financial records. However, during on-site verification, the Commission noted that in table B-2 there was one transaction of



which the invoice date was [invoice date] and was therefore out of the investigation period. The Commission has made its decision to remove this transaction from table B-2. In Section 4.2.1 Sales of the Exporter Verification Report for Sandvik Jining, the Commission has made its conclusion that:

Material revision 1: Removal of a sale from the Australian sales listing

Description: The commission found that Sandvik included a sale with an invoice date of [invoice date] in the Australian sales listing. The commission notes that this sale is outside of the investigation period.

Resolution: The commission removed this sale from the Australian sales listing.

Accordingly, the current total value and volume of the goods exported to Australia by Sandvik Jining are [export value] and [export volume] respectively, which should be used in the subsidy margin calculation.

1.2. Raw material purchase

In the Attachment 15, the sheet (c) Raw material purchase listing used is not the current version, the total benefit [value of benefit] therefrom is also affected and requires correction. We understand this raw material purchase listing is sourced from table G-7.4 Raw material purchases in Sandvik Jining's initial submission. However, during on-site verification, the Commission noted that certain hot rolled coils purchased were of [thickness] and were therefore out of the thickness range of the goods under consideration. The Commission has made its decision to remove those hot rolled coils of [thickness] from table G-7.4. The Commission has requested Sandvik Jining to add a new column in table G-7.4 showing the thickness of each hot rolled coil purchased to facilitate the removal. Sandvik Jining has submitted the file Item 2 - Revised G-7.4 with a column that shows thickness (mm) during the verification. In Section 4.2.2 of the Exporter Verification Report for Sandvik Jining, the Commission has made its conclusion that:

Material revision 7: Removal of certain hot rolled coil purchases from the raw material purchase listing

Description: The goods description limits the thickness of the goods from 2.8 to 3.4 millimetres. In the raw material purchase listing, Sandvik reported coils with various thicknesses, including coils that were outside of the thickness range from the goods description.

Resolution: The commission found it appropriate to delete all the coil purchases that were outside of the thickness range of the goods description, from the raw material purchase listing.



Accordingly, we request the Commission to remove hot rolled coils of [thickness] in thickness from the sheet (c) Raw material purchase listing. After removal, the total benefit should be [value of benefit].

2. Request to revise allocation methodology of total benefit

From the Attachment 15, we understand the Commission has made allocation of the total benefit accordingly to the sales percentage of the goods exported to Australia in all goods under consideration sold by Sandvik Jining. However, we respectfully wish to bring the Commission's attention to the fact that purchases Sandvik Jining reported in table G-7.4 represent raw materials which were consumed for the goods under consideration, rather than raw materials dedicated exclusively for the goods under consideration.

According to Item 78 - Production capacity calculation based on Item 32 cost listing production quantity and Item 79 - Entry list showing Goods and non-goods for capacity spreadsheet G-10 which Sandvik Jining submitted during the verification, it can be found that besides the goods under consideration, Sandvik Jining also manufactured various kinds of other products, including [types of products manufactured]. Hot rolled coils reported in table G-7.4 are shared in production of both the goods under consideration and other products manufactured by Sandvik Jining.

This fact can be verified by checking the raw materials input-output ratio. According to table B-4 Upward sales, we have total volume of the goods under consideration sold in both pieces and MT, which are [sales volume] and [sales volume] respectively, the average weight of one piece of goods is therefore [unit weight per piece]. In addition, in table G-10 Capacity utilization, the total production volume of the goods under consideration during the investigation period was [production volume]. Accordingly, we are able to estimate the total production weight of all goods under consideration manufactured during the investigation period, which is [production weight]. Meanwhile, the total purchase volume of hot rolled coils in the sheet (c) Raw material purchases, after removal of [thickness], is [purchase volume], representing [ratio] the production weight of all goods under consideration. This indicates that the hot rolled coils purchased were consumed for both the goods under consideration and other products.

SN.	Item	Value/volume	Source
(A)	Total volume of the goods in MT	[sales volume]	B-4 Upward sales
(B)	Total volume of the goods in piece	[sales volume]	B-4 Upward sales



(C)	KG per piece of the goods	[unit weight per piece]	Calculation: (B)/(A)*1000
(D)	Total production in piece of the goods	[production volume]	G-10 Capacity utilization
(E)	Estimation of production weight in MT of the goods	[production weight]	Calculation: (C)*(D)/1000
(F)	Total purchases of hot rolled coils in MT	[purchase volume]	Sheet (c) Raw material purchases in Confidential Attachment 15 after removal of [thickness]
(G)	Purchase-to-production ratio	[ratio]	Calculation: (F)/(E)*100%

Therefore, the total benefit should not be allocated entirely to the goods under consideration. Rather, since the purchases of hot rolled coils relate to all products, the total benefit, which is now [value of benefit] as explained in Part 1.2, should first be allocated between the goods under consideration and other products, and thereafter be allocated to the goods under consideration exported to Australia. Since the Commission made the allocation based on sales value, we also suggest the allocation between the goods under consideration and other products to be made according to sales value, the allocation process is:

SN.	Item	Value/volume	Source
(A)	Total benefit in CNY	[value of benefit]	Sheet (c) Raw material purchases in Confidential Attachment 15 after removal of [thickness]
(B)	Total company turnover (all products)	[total turnover]	Sheet (b) Company turnover in Confidential Attachment 15
(C)	Turnover of the goods under consideration	[turnover of goods under consideration]	Sheet (b) Company turnover in Confidential Attachment 15
(D)	Benefit allocated to the goods under consideration	[value of benefit]	Calculation: (A)*(C)/(B)
(E)	Turnover of the goods exported to Australia	[turnover of goods to Australia]	Table B-2 Australian sales listing after removal of one invoice outside the investigation period
(F)	Benefit allocated to the goods exported to Australia	[value of benefit]	Calculation: (D)*(E)/(C)

3. Conclusion and requests

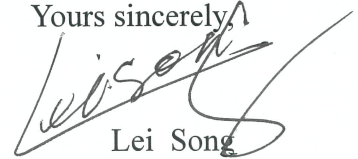


In light of the above, we respectfully request the Commission to consider the grounds and explanations we presented, revise the calculation methodology of subsidy margin and recalculate the subsidy margin for Sandvik Jining.

We fully understand the importance of making final determination in a timely manner. Therefore, for the Commission's convenience, we have prepared a recalculation based on updated data and revised methodology. Please refer to Annex 1 Recalculation - SEF 659 - Confidential Attachment 15 - Sandvik - Appendix 5 - Subsidy Margin attached to this comment.

We once again thank the Commission and look forward to your kind consideration.

Yours sincerely,



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