



Anti-Dumping Commission
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PUBLIC RECORD

Dear Sirs,

Re: Investigation 659 - Certain strata steel bolts from China; Submission of Comments on Statement of Essential Facts (); 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 subsidy margin

We note that the Commission calculated the subsidy margin in Appendix 5. The value of subsidy attribution for the subsidy program "Hot rolled steel provided by government at less than fair market value" is wrongly calculated. It is noted that the main raw material for both the product concerned and another product [CONFIDENTIAL TEXT DELETED – Product type] is hot-rolled steel coils 3.2 reported in Table G-7.4. The sales revenue of the product [CONFIDENTIAL TEXT DELETED – Product type] during the investigation period is [CONFIDENTIAL TEXT DELETED – Revenue amount]. Thus, the value of subsidy attribution for the subsidy program "Hot rolled steel provided by government at less than fair market value" shall be [CONFIDENTIAL TEXT DELETED – Revenue amount].

Accordingly, the subsidy margin shall be 10.3% as shown in the **updated Worksheet (a) Subsidy Calculation in Appendix 5 [CONFIDENTIAL APPENDIX]**.

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

The Commission 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. The Commission errors in determining the LTAR program as a countervailable subsidy in this investigation

The Commissioner preliminarily finds that there is a subsidy program involving the provision of hot rolled steel by public bodies at less than adequate remuneration, which is countervailable. We do not agree with the determination logic on the determination of the LTAR program as a countervailable subsidy. Tanrimine purchased the raw materials steel hot rolled coils all from private companies, which shall not be determined as public body. Although the raw materials steel hot rolled coils were manufactured by a SIE, Tanrimine purchased all from private companies under a market price. Therefore, no financial contribution was made through the provision of hot rolled steel coils at less than adequate remuneration. The Commissioner shall not make a determination that LTAR program is a countervailable subsidy in this investigation and delete the subsidy margin calculated under this program for Tanrimine.

IV. Conclusion

For the above reasons, we consider that both the dumping margin and subsidy margin for Tanrimine is overstated. We respectfully request that the Commission correct the relevant calculation.

The Commission is kindly requested to consider our above comments when making 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.