PUBLIC RECORD

Australian Government
Department of Industry, Science and Resources

Anti-Dumping Commission

CUSTOMS ACT 1901 - PART XVB

REPORT NO 675

INQUIRY CONCERNING THE CONTINUATION OF THE ANTI-DUMPING MEASURES APPLYING TO

ROD IN COIL

EXPORTED TO AUSTRALIA FROM THE PEOPLE'S REPUBLIC OF CHINA

20 February 2026

CONTENTS

ABBREVIATIONS

Abbreviation	Full text
$	Australian dollars
ABF	Australian Border Force
ABS	Australian Bureau of Statistics
ACRS	the Australasian Certification Authority for Reinforcing and Structural Steels
ACIF	the Australian Construction Industry Forum
the Act	*Customs Act 1901*
ADN	Anti-Dumping Notice
ADRP	Anti-Dumping Review Panel
BMB	below market borrowings
CAGR	Compound Annual Growth Rate
CBAM	Carbon Border Adjustment Mechanism
China	the People's Republic of China
CIR 643	*Anti-Circumvention Inquiry 643*
CMRG	the China Mineral Resources Group
the commission	the Anti-Dumping Commission
the Commissioner	the Commissioner of the Anti-Dumping Commission
CON 562	*Continuation Inquiry 562*
CON 660	*Continuation Inquiry 660*
CON 669	*Continuation Inquiry 669*
CTMS	cost to make and sell
DCR	Dumping Commodity Register
the Direction	*Customs (Extensions of Time and Non-cooperation) Direction 2015*
Dumping Duty Act	*Customs Tariff (Anti-Dumping) Act 1975* (Cth)
Echeng	Baowu Group Echeng Iron and Steel Co., Ltd
EPR	electronic public record
EU	European Union
examination period	1 April 2020 to 31 March 2025
FIS	Free Into Store
FOB	Free On Board
FY	financial year ended 30 June
GOC	government of China
the goods	the goods the subject of the application (also referred to as the goods under consideration)
the Guidelines	Guidelines on the Application of Forms of Dumping Duty November 2013
Hoa Phat	Hoa Phat Hai Duong Steel Joint Stock Company
IDD	interim dumping duty

InfraBuild Steel	InfraBuild (Newcastle) Pty Ltd (formerly Liberty OneSteel (Newcastle) Pty Ltd) and The Australian Steel Company (Operations) Pty Ltd, collectively referred to as the Australian Industry.
InfraBuild	InfraBuild (Newcastle) Pty Ltd (also, the applicant)
inquiry period	1 April 2024 to 31 March 2025
IPP	import price parity
INV 655	*Investigation 655*
INV 692	*Investigation 692*
the Manual	the *Dumping and Subsidy Manual (November 2018)*
MCC	model control code
the Minister	the Minister for Industry and Innovation and Minister for Science
NIP	non-injurious price
NDRC	National Development and Reform Commission
OCOT	ordinary course of trade
OECD	Organisation for Economic Co-operation and Development
PMS	particular market situation
rebar	steel reinforcing bar
REP 301	*Anti Dumping Commission Report No 301*
REP 413	*Anti Dumping Commission Report No 413*
REP 414	*Anti Dumping Commission Report No 414*
REP 565	*Anti Dumping Commission Report No 562*
REV 564	*Review 564*
REQ	response to the exporter questionnaire
R&D	research and development
RIC	rod in coil
Korea	the Republic of Korea
SEF	statement of essential facts
SG&A	selling, general and administrative expenses
Shagang	Jiangsu Shagang Group Co. Ltd
SOE	state-owned enterprise
TASCO	The Australian Steel Company (Operations) Pty Ltd (TASCO)
TTM	trailing 12 months
USA	United States of America
USP	unsuppressed selling price
Vietnam	the Socialist Republic of Vietnam
Xingtai	Beijing Xingtai Steel Mesh & Technology Development Co., Ltd
YEM	year ending March

1 SUMMARY AND RECOMMENDATIONS

1.1 Introduction

The Anti-Dumping Commission (the commission) has prepared this final report concerning an inquiry into whether to continue the anti-dumping measures (the measures) applying to rod in coil (RIC, or the goods) exported to Australia from the People's Republic of China (China).

The measures are in the form of a dumping duty notice and are due to expire on **22 April 2026**.[1] The measures were initially imposed by public notice on 22 April 2016,[2] and were continued for a further five years after 22 April 2021.[3]

The Commissioner of the Anti-Dumping Commission (the Commissioner) initiated this inquiry on 19 May 2025 following their consideration of an application[4] received from InfraBuild (Newcastle) Pty Ltd (InfraBuild)[5] seeking the continuation of the measures.[6]

Section 269ZHF(2) provides that the Commissioner must not recommend that the Minister for Industry and Innovation and the Minister for Science (the Minister) take steps to secure the continuation of the measures unless the Commissioner is satisfied that the expiration of the measures would lead, or would be likely to lead, to a continuation of, or a recurrence of, the dumping and the material injury that the measure is intended to prevent.

This final report sets out the material findings of fact and particulars of the evidence on which the Commissioner has based their recommendations to the Minister.

1.2 Recommendations

The Commissioner is satisfied that the expiration of the measures on the goods exported to Australia from China would be likely to lead to a continuation of, or a recurrence of, dumping and the material injury that the measures are intended to prevent.

As outlined in chapter 10, pursuant to section 269ZHF(1), the Commissioner recommends that:

- the Minister take steps to secure the continuation of the dumping duty notice applying to the goods exported to Australia from China, and

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[1] Section 269TM and 269ZHG(5) of the *Customs Act 1901* (the Act). All legislative references are to the *Customs Act 1901*, unless otherwise specified.

[2] Electronic public record (EPR) for case 301, no 39, Anti-Dumping Notice (ADN) 2016/47.

[3] EPR 562, no 11, ADN 2021/032.

[4] EPR 675, no 1.

[5] As outlined in the application, the Australian industry consists of InfraBuild and one other related party producer, The Australian Steel Company (Operations) Pty Ltd, collectively referred to as 'InfraBuild Steel'.

[6] EPR 675, no 2, ADN 2025/040.

- the dumping duty notice have effect in relation to exports of the goods from China as if different variable factors have been ascertained and that the rate of interim dumping duty (IDD) in Table 1 apply to the goods exported from China to Australia from **23 April 2026**.[7]

Country	Exporter	Fixed rate of IDD	Duty method
China	All exporters	13.9%	Combination

Table 1: Recommended measures resulting from this inquiry

If the Minister accepts the Commissioner's recommendations, the measures will be continued for a further 5 years and the rate of IDD in Table 1 would apply to the goods exported from China to Australia from **23 April 2026**.

1.3 Conduct of the inquiry

The commission is assisting the Commissioner to conduct the inquiry, pursuant to the commission's function specified in section 269SMD.

The Commissioner notified interested parties of the initiation of this inquiry in ADN 2025/040, published on 19 May 2025. Interested parties were invited to lodge submissions and responses to questionnaires.

The Commissioner established an inquiry period of 1 April 2024 to 31 March 2025 (the inquiry period).[8] To analyse the performance of the Australian industry in the years before and after measures were imposed, the Commissioner has examined the period from1 April 2020 to 31 March 2025 (the examination period).

In preparing this report, the Commissioner had regard to:

- the application seeking a continuation of the measures
- import data obtained from the Australian Border Force (ABF) import database
- submissions relating generally to the continuation of the measures to which the Commissioner has had regard for the purpose of formulating the *Statement of Essential Facts No 675* (SEF 675)
- SEF 675, published on 23 December 2025,[9] which sets out the preliminary findings of the Commissioner and the proposed recommendations to the Minister based on the available information at that time
- the submission received in response to SEF 675 from InfraBuild
- other information as referenced in this report.

[7] Section 269ZHF(1)(a)(iii).

[8] EPR 675, no 2, ADN 2025/040.

[9] EPR 675, no 8.

1.4 Summary of findings

For the reasons set out in this report, the Commissioner is satisfied that the expiration of the measures in respect of exports of the goods from China would lead, or would be likely to lead, to a continuation of, or a recurrence of, the dumping and the material injury that the measures are intended to prevent.

A summary of each chapter in this report is outlined below.

1.4.1 The goods, like goods and the Australian industry (chapter 3)

The Commissioner finds locally produced goods are 'like' to the goods the subject of the application. At least one substantial process in the manufacture of RIC is carried out in Australia and therefore there is an Australian industry producing like goods. The Commissioner is satisfied that there is an Australian industry, comprised of InfraBuild and The Australian Steel Company (Operations) Pty Ltd (TASCO) (collectively InfraBuild Steel), producing those like goods.

1.4.2 Australian market (chapter 4)

The Australian RIC market is supplied by InfraBuild Steel and imports from other countries, none of which are subject to measures. No goods were exported from China during the inquiry period.

RIC is primarily sold to manufacturers who then fabricate the RIC into other products, such as reinforcing mesh. InfraBuild Steel, importers and exporters compete for sales of RIC to manufacturers.

Demand is closely linked to the construction industry. The commission considers that demand for RIC in Australia will continue to grow for the foreseeable future.

RIC is a commodity product, and provided the goods meet the grade requirements for the desired end use there are limited ways in which suppliers can differentiate their product offering beyond price and service. InfraBuild Steel's selling prices reference an import price parity (IPP) model, where import prices influence the overall price. InfraBuild Steel's pricing also includes an assessment of input costs.

1.4.3 Economic condition of the Australian industry (chapter 5)

The Commissioner assessed the economic condition of the Australian industry from 1 April 2020 to analyse trends in the market for RIC and assess potential injury factors.

The Commissioner has found that InfraBuild Steel has recently experienced a decline in its economic condition. The Commissioner found a decline in the following key economic indicators for InfraBuild Steel:

- sales volumes and market share since year ending March (YEM) 2021
- price depression and price suppression since YEM 2023
- profit and profitability since YEM 2023.

Based on the economic indicators assessed by the commission, the Commissioner considers that InfraBuild Steel remains susceptible to material injury caused by dumped exports.

1.4.4 Likelihood of dumping and material injury continuing or recurring (chapter 6)

The Commissioner's has found that the expiry of the measures would lead, or would be likely to lead, to a continuation or recurrence of the dumping and material injury that the measures are intended to prevent. The Commissioner has reached this view based on the following findings.

Likelihood of future exports (section 6.5)

The commission considers that, despite ceasing, should the measures expire, exports from China are likely to resume. This finding is based on the following significant factors:

- Exporters changed their behaviour in response to measures
- Exporters can readily establish distribution links in Australia
- Exporters have excess production capacity that could be directed towards Australia
- Excess production capacity in China is influencing market conditions in China, placing pressure on its exporters to seek out export markets
- Trade measures in other jurisdictions would make Australia a more attractive export market for exporters from China in the absence of measures.

Likelihood of dumping (section 6.6)

The commission considers that the expiry of the measures would be likely to lead to a recurrence of dumping of RIC from China. This finding is based on the following significant factors:

- The goods were dumped in the original investigation, and the periods examined in subsequent reviews
- The commission has assessed that the goods would have likely been dumped if they were exported during the inquiry period
- The price sensitive nature of the Australian RIC market promotes a high level of competition between exports
- The goods have been found to be dumped in other jurisdictions.

Likelihood of material injury (section 6.7)

The commission considers that the expiry of the measures would be likely to lead to a continuation of or a recurrence of material injury that the measures are intended to prevent. This finding is based on the following significant factors:

- The expiry of measures would provide exporters from China with a price advantage in a price-sensitive market
- Exports from China would likely re-emerge and potentially increase, impacting InfraBuild Steel's sales volumes
- InfraBuild Steel has considerable regard to import prices through its IPP model
- A reduction in import prices as exporters seek to compete in a market absent of measures would place downwards pressure on InfraBuild Steel's prices.

1.4.5 Variable factors – export price and normal value (chapter 7)

The Commissioner has determined that the export price and normal value have changed for all exporters.

Whilst there were no exports of the goods from China to Australia during the inquiry period, for the purposes of this inquiry the commission has calculated variable factors for the inquiry period. Section 7.3 outlines in detail the approach to determining the export price and normal value, including calculating the normal value using an alternative calculation method which uses an adjusted benchmark for steel billet costs and other costs, rather than the method applied in previous reviews.

Using the difference between the export price and normal value, the commission has calculated a margin of dumping as set out in Table 2.[10]

Country	Exporter	Dumping margin
China	All exporters	13.9%

Table 2: Dumping margin

1.4.6 Variable factor - Non-Injurious Price (chapter 8)

Having regard to the available information, the commission has calculated a non-injurious price (NIP) for the goods exported to Australia, being the minimum price necessary to prevent the injury, or a recurrence of the injury, to the Australian industry caused by the dumping of the goods exported from China.

The commission has determined that the NIP has changed since it was last ascertained for all exporters from China. As this NIP is higher than the normal value established for all exporters from China the NIP is not operative, and the lesser duty rule will not apply.

1.4.7 Duty method (chapter 9)

The Commissioner recommends that, in continuing the measures, the *combination* duty method continue to be used to calculate the IDD payable by all exporters from China. This is the same as the current method.

Country	Exporter	Current measures	Recommended measures
China	All exporters	Combination (fixed rate of 33.1%)	Combination (fixed rate of 13.9%)

Table 3: Current and recommended fixed rate of IDD and duty method

[10] This remains the same as the preliminary margin published in SEF 675.

1.5 Recommendations (chapter 10)

As outlined in chapter 10, pursuant to section 269ZHF(1), the Commissioner recommends that:

- the Minister take steps to secure the continuation of the dumping duty notice applying to the goods exported to Australia from China, and
- the dumping duty notice have effect in relation to exports of the goods from China as if different variable factors have been ascertained.[11]

If the Minister accepts the Commissioner's recommendations, the rate of IDD in Table 4 would apply to the goods exported from China to Australia from **23 April 2026**.

Country	Exporter	Fixed rate of IDD	Duty method
China	All exporters	13.9%	Combination

Table 4: Recommended measures resulting from this inquiry

[11] Section 269ZHF(1)(a)(iii).

2 BACKGROUND

2.1 Legislative framework

The procedures to be followed by the Commissioner in an application for the continuation of the measures are set out in Division 6A of Part XVB.

2.1.1 Legislative test

Under section 269ZHF(2), the Commissioner must not recommend that the Minister take steps to secure the continuation of the measures unless the Commissioner is satisfied that the expiration of the measures would lead, or would be likely to lead, to a continuation of, or a recurrence of, the dumping and the material injury that the measure is intended to prevent.

2.1.2 Statement of essential facts

Section 269ZHE(1) requires the Commissioner to publish a statement of the facts on which they propose to base their recommendations to the Minister about the continuation of the measures. This is referred to as the SEF.

Section 269ZHE(2) requires the Commissioner, in formulating the SEF, to have regard to the application and any submissions received within 37 days of the initiation of the inquiry. Under section 269ZHE(3), the Commissioner is not obliged to have regard to any submissions relating generally to the inquiry that are received by the Commissioner after the 37 days if to do so would, in the Commissioner's opinion, prevent the timely placement of the SEF on the EPR.

The Commissioner may also have regard to any other matters they consider relevant.

The Commissioner placed SEF 675 on the EPR on 23 December 2025.[12]

2.1.3 Final report

Section 269ZHF(1) requires the Commissioner, after conducting an inquiry, to give the Minister a report which recommends that the relevant notice:

- remain unaltered
- cease to apply to a particular exporter or to a particular kind of goods
- have effect in relation to a particular exporter or to exporters generally as if different variable factors had been ascertained, or
- expire on the specified expiry day.

[12] EPR 675, no 8. The initiation notice advised publication of SEF 675 was due on or before 8 September 2025. The Commissioner approved extensions of time for the publication of SEF 675 on 25 August 2025 and 17 November 2025. See ADN 2025/076 and ADN 2025/120. See EPR 675, no's 3 and 6.

Pursuant to section 269ZHF(3)(a) the Commissioner, in deciding on the recommendation to be made to the Minister in their final report, must have regard to the application, submissions relating generally to the continuation of measures considered by the Commissioner in formulating the SEF and any submission responding to the SEF received within 20 days of publication of the SEF. The Commissioner may also have regard to submissions received after this time in accordance with section 269ZHF(4).

The Commissioner may also have regard to any other matter they consider relevant.

In accordance with section 269ZHF(5), the final report to the Minister must include a statement of the Commissioner's reasons for any recommendation contained in the report, set out the material findings of fact on which the recommendation is based and provide particulars of the evidence relied on to support those findings.

2.2 Application and initiation

On 21 February 2025, the Commissioner published a notice[13] on the commission's website inviting the following persons to apply for the continuation of the measures:

- the person whose application under section 269TB resulted in the measures,[14] or
- persons representing the whole or a portion of the Australian industry producing like goods to the goods covered by the measures.[15]

On 17 April 2025, InfraBuild, the person whose application resulted in the measures, lodged an application for the continuation of the measures on the goods exported to Australia from China.[16]

The Commissioner was satisfied that:

- the application complied with section 269ZHC (content and lodgement requirements),[17] and
- there appeared to be reasonable grounds for asserting that the expiry of the measures might lead, or might be likely to lead, to a continuation of, or a recurrence of, the material injury that the measures are intended to prevent.[18]

The Commissioner therefore decided not to reject the application and published ADN 2025/040 initiating the present inquiry on 19 May 2025.[19]

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[13] In accordance with section 269ZHB(1). See ADN 2025/003, available on the commission's website.

[14] Section 269ZHB(1)(b)(i).

[15] Section 269ZHB(1)(b)(ii).

[16] Under section 269ZHC. A non-confidential version of the application is available on EPR 675, no 1.

[17] Section 269ZHD(2)(a).

[18] Section 269ZHD(2)(b).

[19] EPR 675, no 2.

2.3 Current measures

The measures were initially imposed by public notice on 22 April 2016 by the relevant Minister following the original investigation (*Investigation 301)*. The findings of that original investigation are detailed in *Anti-Dumping Commission Report No 301* (REP 301).[20]

Table 5 summarises the current measures applying to China.[21]

Country	Exporter	Dumping notice	
		Duty method	Fixed IDD rate
China	All exporters	Combination	33.1%

Table 5: Measures applying to exports of the goods

Further details about these measures can be found on the Dumping Commodity Register (DCR) on the commission's website.[22]

2.3.1 Previous cases involving China

The notice the subject of this inquiry was published on 22 April 2016 (ADN 2016/047). The notice was later revised after a review by the Anti-Dumping Review Panel (ADRP) on 13 January 2017 with new dumping margins substituted.

The commission subsequently reviewed the measures three times in 2018, 2019, and 2020.

On 12 April 2021, the then Minister for Industry, Science and Technology, after consideration of *Anti-Dumping Commission Report No 562* (REP 562) (ADN 2021/032), accepted the Commissioner's recommendation to continue the measures for a further 5 years.

Table 6 outlines previous cases involving the goods from China.

Case type and number	ADN number	Date Published	Country of export	Findings
Investigation 301	2016/47	22 April 2016	China	Dumping duties imposed.
ADRP Review 2016/40	Public Notice - Minister's Decision	13 January 2017	China	Revoked the decision (REP 301) and substituted a new decision with new IDD rates.

[20] EPR 301, no 38.

[21] EPR 562, no 11.

[22] The DCR is available at Current measures in the dumping commodity register.

Case type and number	ADN number	Date Published	Country of export	Findings
Investigation REP 331 TER 331	2016/93 2016/92	18 October 2016 19 September 2016	China	The first notice terminated the investigation of Jiangsu Shagang Group Co. Ltd (Shagang) as the countervailing margin was found to be negligible. The second notice terminated the investigation because the countervailing was not found to have caused the injury.
Review 413 & 414	2018/50	19 April 2018	China	Dumping duty notice varied in relation to exports from Shagang and Hunan Valin Xiangtan Iron & Steel Co., Ltd.
ADRP Review 2018/83	Public Notice - Minister's Decision	9 November 2018	China	Revoked decisions (REP 413 & REP 414) and substituted new decisions with new IDD rates.
Review 468	2019/11	15 February 2019	China	The variable factors were changed for all exporters from China.
Review 564	2020/141	24 December 2020	China	The variable factors were changed for all exporters from China.
Continuation 562	2021/032	12 April 2021	China	Continuation of measures for all exporters from China for a further 5 years (until 22 April 2026).

Table 6: Previous cases involving China

Further details about these measures can be found on the DCR on the commission's website.[23]

2.3.2 Cases involving other countries

While there are currently no measures in place in relation to exports of RIC from other countries, Table 7 provides a summary of previous investigations into RIC exported from other countries.

[23] The DCR is available at Current measures in the dumping commodity register.

Case type and number	ADN number	Date Published	Country of export	Findings
Investigation 240 Termination 240	2015/76 2015/59	17 June 2015 13 May 2015	• Republic of Indonesia • Taiwan • Republic of Türkiye	Dumping duties imposed on Indonesia and Taiwan (except for PT Ispat Indo for which the investigation was terminated) only. The investigation for Türkiye was terminated. *The measures applying to Taiwan subsequently expired on 18 June 2020 as no application to continue the measures was received.*
Reinvestigation 318 ADRP Review 2015/31	Public notice	22 August 2016	• Republic of Indonesia • Taiwan	Measures revoked as they relate to Indonesia.
Investigation 416	2018/53	26 March 2018	• Republic of Indonesia • Republic of Korea • Socialist Republic of Vietnam	Investigation terminated for all countries.

Table 7: Summary of cases relating to RIC exported from other countries

Anti-Circumvention Inquiry 643 and Investigation 692

The commission recently concluded *Anti-Circumvention Inquiry 643* (CIR 643), and shortly after, initiated *Investigation 692* (INV 692), both in response to applications regarding steel mesh sheets exported from China to Australia. CIR 643 assessed whether the measures on RIC were circumvented by exporting 'slightly modified' RIC as reinforcing steel mesh from China to Australia. The inquiry found no circumvention activity. Subsequently, the commission received an application for a dumping investigation into welded mesh from China, leading to the initiation of INV 692 on 25 November 2025.[24]

[24] EPR 692, no 3, ADN 2025/114.

INV 692 and CIR 643 are both distinct and separate inquiries to this inquiry, however, the commission recognises that the goods subject to this inquiry, RIC, are predominantly manufactured and/or purchased for the purpose of further processing into reinforcing mesh products. The commission acknowledges that the demand for RIC in Australia is largely driven by its role as an input for reinforcing steel mesh production, and therefore, trends observed in the reinforcing steel mesh market may have implications when considering the competitive market environment for RIC. This close functional relationship means that the commission has had regard to information on the record for INV 692 and CIR 643 where applicable.

2.4 Conduct of the inquiry

2.4.1 Periods examined

The Commissioner established an inquiry period of 1 April 2024 to 31 March 2025. The commission invited interested parties to provide information relevant to this period to determine normal values and export prices and assess whether dumping has occurred.

To analyse the performance of the Australian industry in the years before and after the measures were imposed, the commission has examined the period from 1 April 2020. In some instances, it is necessary for the commission to analyse information prior to 2020 to examine the effects of the measures.

2.4.2 Questionnaires and verification

Australian industry

The Commissioner is satisfied that the applicant InfraBuild, and its related party TASCO (collectively InfraBuild Steel) are the sole members of the Australian industry producing like goods to the goods the subject of this inquiry.[25]

The commission conducted a verification visit to InfraBuild Steel's premises in August 2025 and made additional enquiries about InfraBuild Steel's information through electronic and other channels. The resulting verification report is available on the EPR.[26]

Importers and end users

The commission did not identify any importers in the ABF import database in relation to the goods from China during either the inquiry period or since 2020. As such the commission did not send any questionnaires to current importers but did invite any interested importers to contact the commission.[27]

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[25] See chapter 3.

[26] EPR 675, no 5.

[27] EPR 675 Importer/End User Questionnaire.

As there were no recent imports of the goods, the commission also sent questionnaires to potential purchasers/end users of RIC within the Australian market to seek input to inform its understanding of the dynamics of the Australian market and facts that may be impacting the economic condition of the Australian industry producing RIC.

The commission did not receive any responses to the above questionnaires, nor any additional requests for an importer/end user questionnaire or associated correspondence.

Exporters

The commission did not identify any suppliers of the goods from China in the ABF import database either during the inquiry period or since 2020. On this basis the commission did not send any questionnaires to potential exporters. The relevant export questionnaire was placed on the commission's EPR for completion by any potential exporters.

The commission did not receive any completed exporter questionnaires (REQ) or correspondence from exporters.

The Commissioner considers that all exporters from China are uncooperative exporters for the purpose of this inquiry (refer Section 7.2). [28]

Government of China

On 19 May 2025, the commission sent a government questionnaire to the Government of China (GOC) seeking information about whether there was a situation in the Chinese steel RIC market during the inquiry period that make sales within that market unsuitable for determining normal values.

A copy of the questionnaire sent to the Chinese government is on the EPR.[29] The GOC was informed that if it did not respond, the commission may be required to rely on information supplied by other parties.

The commission did not receive a response to this questionnaire from the GOC.

2.4.3 Submissions received from interested parties

The commission received the submission listed in Table 8 before publishing the SEF.

EPR No	Interested party and topic of submission	Date received	Chapter reference
7	InfraBuild Steel – Chinese RIC market assessment	18 November 2025	Chapter 7

Table 8: Submissions received prior to the SEF

The Commissioner had regard to the submission in Table 8 in making their preliminary findings outlined in SEF 675.

[28] 'Cooperative exporter' and 'Uncooperative exporter' are defined in section 269T(1).

[29] EPR 675, GOC questionnaire.

Table 9 details the single submission received after the publication of SEF 675.

EPR No	Interested party and topic of submission	Date received	Chapter reference
9	InfraBuild Steel – Submission on SEF 675	13 January 2026	Chapters 6-7 & 9

Table 9: Submissions after the publication of the SEF

The Commissioner must have regard to any submission made in response to the SEF provided by interested parties within 20 days of the Commissioner publishing the SEF on the public record.[30] The Commissioner is not obliged to have regard to any submission in response to the SEF after this date, if to do so would, in the Commissioner's opinion, prevent the timely preparation of the final report to the Minister.[31] The Commissioner may also disregard information for which an interested party did not provide a public summary unless it could demonstrate the information was correct.[32] The commission generally won't consider a submission where the interested party hasn't provided a non-confidential summary of the confidential information or a statement of reasons as to why a non-confidential summary could not be provided.[33]

The Commissioner has had regard to each of the submissions referred to in Table 8 and Table 9 in the preparation of this report.

[30] Section 269ZHF(3)(a)(iv).

[31] Section 269ZHF(4).

[32] Sections 269ZJ(5) and (6).

[33] See the commission's website page concerning *How to lodge a submission in response to an anti-dumping or countervailing case*.

3 THE GOODS, LIKE GOODS AND THE AUSTRALIAN INDUSTRY

3.1 Finding

The Commissioner finds that:

- locally manufactured goods are 'like' to the goods subject to the measures
- there is an Australian industry, comprised of 2 related entities, producing like goods, being InfraBuild Steel
- the like goods are wholly manufactured in Australia.

3.2 Legislative framework

To be satisfied that the expiration of the measures would lead, or would be likely to lead, to a continuation or recurrence of dumping and the material injury that the measure is intended to prevent, the Commissioner firstly determines whether the goods produced by the Australian industry are 'like' to the imported goods.

Section 269T(1) defines like goods 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 definition of like goods is relevant in the context of this inquiry in determining the Australian industry and whether the expiry of the measures would lead to a continuation of, or a recurrence of, the dumping and material injury that the measures are intended to prevent. The commission's framework for assessing like goods is outlined in chapter 2 of the *Dumping and Subsidy Manual* (the Manual).[34]

Where the locally produced goods and the imported goods are not alike in all respects, the Commissioner assesses whether the respective goods have characteristics closely resembling each other. The Commissioner considers:

- physical likeness
- commercial likeness
- functional likeness, and
- production likeness.

The Commissioner must also consider whether the Australian industry manufactures 'like' goods in Australia. Section 269T(2) specifies that for goods to be regarded as being produced in Australia, they must be either wholly or partly manufactured in Australia. Under section 269T(3), to be considered as partly manufactured in Australia, at least one substantial process in the manufacture of the goods must be carried out in Australia.

The following analysis therefore establishes the scope of the commission's inquiry.

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[34] Available at Dumping and subsidy manual (the Manual).

3.3 The goods subject to the measures

ADN 2025/040 defined the goods the subject to the measures as follows:[35]

> *Hot-rolled rods in coils of steel, whether or not containing alloys, that have maximum cross sections that are less than 14mm. The goods covered include all steel rods meeting the above description regardless of the particular grade or alloy content.*

Goods excluded from the measures are:

> *Hot-rolled deformed steel reinforcing bar in coil form, commonly identified as rebar or debar, and stainless steel in coils.*

3.3.1 Tariff classification

The goods are generally classified according to the following tariff subheadings in Schedule 3 to the *Customs Tariff Act 1995*:[36]

Tariff subheading	Statistical code	Description
7213	**BARS AND RODS, HOT-ROLLED, IN IRREGULARLY WOUND COILS, OF IRON OR NON-ALLOY STEEL**	
7213.91	Other	
7213.91.00	**44**	Of circular cross-section measuring less than 14 mm in diameter
7227	BARS AND RODS, HOT-ROLLED, IN IRREGULARLY WOUND COILS, OF OTHER ALLOY STEEL	
7227.90	Other	
7227.90.90	**02**	Of circular cross-section measuring less than 14 mm in diameter

Table 10: Tariff classification of the goods

[35] EPR 675, no 2.

[36] These tariff classifications and statistical codes may include goods that are both subject and not subject to the measures. The listing of these tariff classifications and statistical codes is for convenience or reference only and does not form part of the goods description. Please refer to the goods description for authoritative detail about goods subject to the measures.

3.4 Model control codes

Table 11 lists the model control code (MCC) structure that the commission proposed in ADN 2025/040, which describes the key characteristics of the goods.

Item	Category	Identifier	Sub-category	Sales data	Cost data
1	Prime	P	Prime	Mandatory	N/A
		N	Non-prime		
2	Alloy[37]	A	Alloy	Mandatory	Mandatory
		N	Non-alloy		

Table 11: MCC structure

The commission invited interested parties to make submissions on any proposed changes to this MCC structure. The commission did not receive any submissions concerning the MCC structure. Accordingly, the commission has adopted this MCC structure for the purposes of this inquiry.

3.5 Australian industry – domestic production

3.5.1 InfraBuild Steel

InfraBuild Steel are the only manufacturers in Australia which produce RIC.

As a producer with end-to-end capabilities, InfraBuild Steel and its related entities produce its own billet, which is then converted into RIC (among other products not the subject of this inquiry). InfraBuild Steel manufactures RIC using steel billets that are primarily sourced from its own electric arc furnace steel mills operated at Rooty Hill or Laverton. Billet is also sourced from OneSteel Manufacturing Pty Ltd (Administrators Appointed) (OneSteel) in Whyalla in South Australia, which manufactures steel using a Blast Oxygen Furnace process.[38] Billet is also occasionally sourced from overseas suppliers.

3.5.2 Production process

Production of RIC initially starts with billets that are reheated in a furnace to approximately 1,200°C. The billet is then passed through a series of rolling 'stands' where the billet changes shape and progressively reduces in size. The intermediate rod is then looped into rings, cooled on a cooling conveyor, and then formed into a coil.

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[37] For the purpose of the description of this category of the MCC, 'alloy' here means steel containing a chemical composition that at least meets or exceeds the minimum chemical element proportions specified in Note (f) 'Other alloy steel' to Chapter 72 under Schedule 3 of the Customs Tariff Act 1995.

[38] OneSteel Manufacturing Pty Ltd was related to InfraBuild Steel prior to 19 February 2025, when OneSteel Manufacturing Pty Ltd was placed under administration. Refer to https://kordamentha.com/knowledge-hub/kordamentha-appointed-va-whyalla-steelworks-mining/. Following the appointment of administrators the parties ceased to be related.

The commission is satisfied that there have been no substantive changes to InfraBuild Steel's manufacturing processes in the period between CON 562 and this inquiry.

3.6 Like goods assessment

The Commissioner is satisfied that locally produced RIC is like to the subject to the measures because the following characteristics of each closely resemble each other:[39]

- physical likeness
- commercial likeness
- functional likeness
- production likeness.

In so finding, the commission has relied on information provided by InfraBuild Steel, as well as previous cases (see Table 6).

3.6.1 Physical likeness

The commission considers that the locally produced RIC is physically like the goods subject to the measures.

The primary physical characteristics of the locally produced RIC are similar to the goods subject to the measures (previously exported from China noting there were no exports from China during the inquiry period), notwithstanding variations in the technical specifications of those goods – for example, relating to grade or thickness.[40]

RIC sold on the Australian market (both locally produced and imported) is typically produced with nominal diameters ranging from 5 mm to 13.5 mm with alloyed and/or non-alloyed properties. The commission has previously found that the steel grades used to produce locally made RIC and imported RIC are typically in accordance with Australian Standard AS 1442:2007.[41] The Commission understands that this standard is still in force in Australia.

3.6.2 Commercial likeness

The commission considers the locally produced RIC to be commercially like to the goods the subject of the measures.

In the Australian market, locally produced RIC competes directly and indirectly with RIC imported from other countries, including in the past, China. InfraBuild Steel, exporters and importers sell RIC to common customers and on similar commercial terms or conditions.

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[39] Like goods are defined in section 269T(1).

[40] EPR 301, no 38 (*Anti-Dumping Commission Report No 301)*.

[41] EPR 675, no 5 (*Anti-Dumping Commission Termination Report No 416)*.

RIC is an intermediate good that is further processed into another product, typically reinforcing steel mesh, before the end use application. Processors and distributors purchase locally made and imported RIC and can readily switch between suppliers. During verification with InfraBuild Steel, the commission observed that locally produced and imported RIC uses similar distribution channels, is sold to common customers and are commercially interchangeable.

3.6.3 Functional likeness

The commission considers that the locally produced RIC is functionally like to the goods subject to the measures. Both can have the same function and are used in the same end-use applications.

Locally produced RIC is highly interchangeable or substitutable with the goods the subject of measures, given that both goods are sold to the same customers and for identical or comparable end uses.

The locally produced RIC and goods subject to the measures are both primarily drawn into wire and made into mesh, which is used to reinforce concrete products. Other uses include:

- wire manufacturing
- mine mesh manufacturing
- general manufacturing such as springs
- reinforcing ligatures.

Based on prior cases, including associated verification visits, the commission is satisfied that locally produced RIC and imported RIC are both used for the same end uses.[42] The commission has found that customers do not consider any alternative products to be a suitable substitute for RIC.

3.6.4 Production likeness

The commission considers the locally produced goods and the goods the subject of the measures are produced using similar production processes and raw material inputs.

All RIC is manufactured from steel billet, which is then rolled/drawn to a specified diameter and then coiled and cooled. The commission considers that the locally produced RIC are produced using similar raw material inputs and production processes to the goods the subject of the measures. This is based on findings in prior cases and the commission's understanding of the production process where the commission found that locally produced RIC and the goods subject to the measures were manufactured in a similar manner.

[42] EPR 301, no's 25 and 28.

3.7 Conclusion – Australian industry

Based on the commission's analysis, the Commissioner is satisfied that:

- locally produced RIC is like to the goods the subject of the measures[43]
- at least one substantial process of manufacture of RIC is carried out in Australia[44]
- the like goods were, therefore, wholly or partly manufactured in Australia by InfraBuild Steel[45]
- there is an Australian industry, consisting of InfraBuild Steel which produces like goods in Australia.[46]

[43] Section 269T(1) (definition of 'like goods').

[44] Section 269T(3).

[45] Section 269T(2).

[46] Section 269T(4).

4 AUSTRALIAN MARKET

4.1 Finding

The Commissioner finds that during the inquiry period the Australian market for RIC was supplied by the Australian industry and imports from several exporting countries not currently subject to any measures.

4.2 Approach to analysis

As discussed in Chapter 3, InfraBuild Steel is the sole member of the Australian industry. The analysis in this chapter is based on verified financial information submitted by InfraBuild Steel and data captured in the ABF import database.

The period from 1 April 2020 has been examined for the purpose of analysing trends in the Australian market for RIC and for making observations with respect to the economic condition of the Australian market.

4.3 Market structure

4.3.1 Market segmentation and end use

The Australian RIC market comprises Australian producers, exporters, importers, and processors.

According to InfraBuild Steel, the key market segments for RIC are:

- residential construction (main source of demand for the goods)
- non-residential commercial construction
- engineering construction, which also includes infrastructure, mining, oil and gas.

The commission understands that RIC is primarily an intermediate good that is further processed into other products, being purchased for drawing into concrete reinforcing mesh, wire manufacturing, mine mesh, and reinforcing ligatures. A small quantity of RIC is used in general manufacturing applications such as springs and engineered steel components. Final end uses include concrete slabs, footings, precast panels, footpaths and driveways.

There is limited substitutability of RIC with other products owing to the physical properties of steel as a reinforcing medium.[47] RIC is therefore a ubiquitous product in the Australian construction industry, and the commission expects RIC to continue to be a dominant reinforcing product for the foreseeable future.

RIC is a commodity product and provided the goods meet the grade requirements for the desired end use there are limited ways in which suppliers can differentiate their offering beyond price and service.

[47] For example, refer EPR 643, No 32 (ADN 2025/100 - Findings of CIR 643).

4.3.2 Supply and distribution

Local production of RIC is supplemented by imports, with distributors and manufacturers engaged with producers from other countries.

The Australian industry sells RIC to related and independent processors and direct to some manufacturing customers. Product is despatched to customers from inventory, which is held at the Australian manufacturer's mills. Once sold, the products are transported via road, rail or sea freight to the customer.

Figure 1 details the channels to market for RIC in Australia.

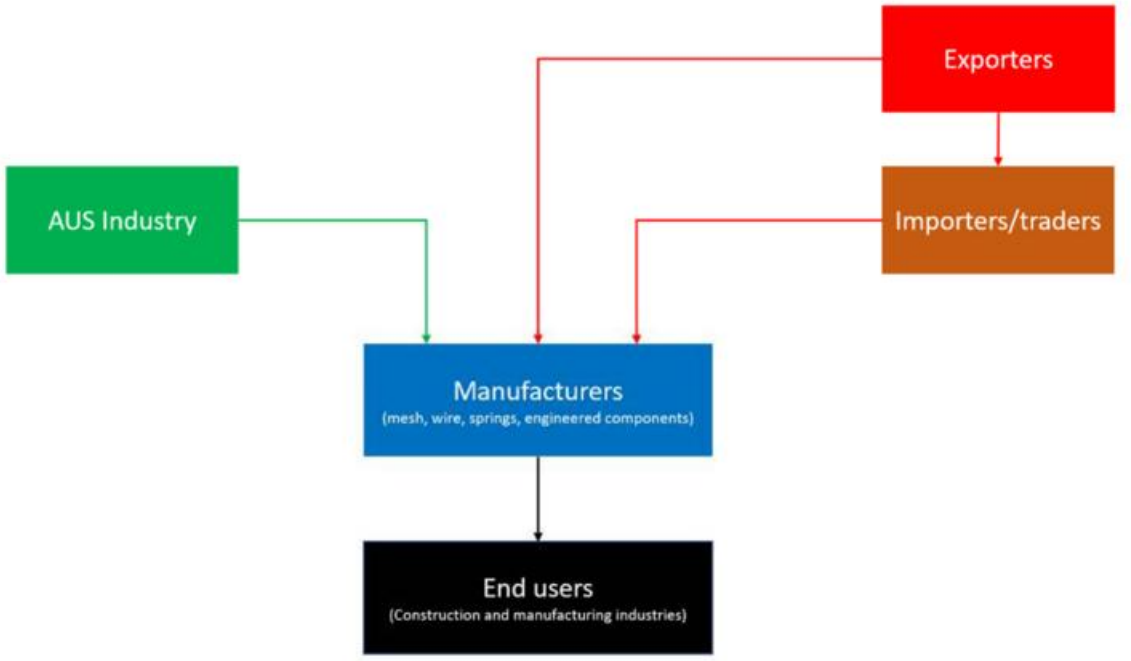

Figure 1: Channels to market for RIC

Exporters, importers and InfraBuild Steel utilise the same channels to market, supplying RIC to manufacturers who then supply the fabricated products to end users.

The Australian industry can supply RIC from stock (if available) or from scheduled production. The supply of RIC from stock can occur within two days. The supply of specialist grades or specifications will depend on the rolling schedule. In contrast, InfraBuild Steel claims that the lead time from an exporter from order confirmation through to the receipt of the goods can range from two to three months. Exporters generally supply mesh grade RIC as demand for this is more predictable than non-standard products.

Related InfraBuild Steel entities source their entire supply of RIC from InfraBuild Steel. The commission understands that non-related end users typically purchase a combination of imported and locally produced RIC.

4.4 Demand

4.4.1 Demand drivers

There are multiple factors which influence the demand and source of supply of RIC.

Demand for RIC is closely aligned to the level of construction activity in Australia. It is largely influenced by the residential construction sector (including associated shifts in focus from Government and private investment), where it is used to reinforce concrete.

At a macro level, drivers of demand are the availability of credit to fund construction works and population growth. The degree to which demand is sensitive to these broad factors can differ between market segments, and the effect of changes in demand are not necessarily experienced consistently in different market segments. There are therefore a diverse range of specific factors at play within market segments that contribute to the demand for RIC in the Australian market.

4.4.2 Demand outlook

The commission considers that demand for RIC in Australia will continue to grow.

The Australian industry and importers have regard to forecasts for demand to manage their supply chains. In May 2025, the Australian Construction Industry Forum (ACIF) projected the total value of building and construction work in Australia to reach $334 billion in financial year (FY) 2024-25, with growth of 1.6% this year and 1.9% in 2025-26.[48] By 2026-27, the industry is expected to expand to $353 billion, supported by easing interest rates, a recovery in residential building, and renewed business investment in large-scale projects such as data centres[49]. While growth in major transport infrastructure is tapering, the next wave of expansion may possibly be driven by renewable energy projects, water infrastructure and housing supply initiatives responding to population growth.[50] These factors position engineering and infrastructure construction, along with residential recovery, as the key drivers of growth over the next 5 years.[51]

[48] Australian Construction Industry Forum (ACIF), 'Australian Construction Market Report, November 2025 – ACIF Forecasts Project Slower Growth', *ACIF website*, n.d., last accessed 8 September 2025.

[49] Ibid.

[50] Ibid.

[51] Ibid.

Figure 2 shows the total investment in residential and non-residential building work by quarter since 1 July 2015. The dotted line shows the trend over this time.

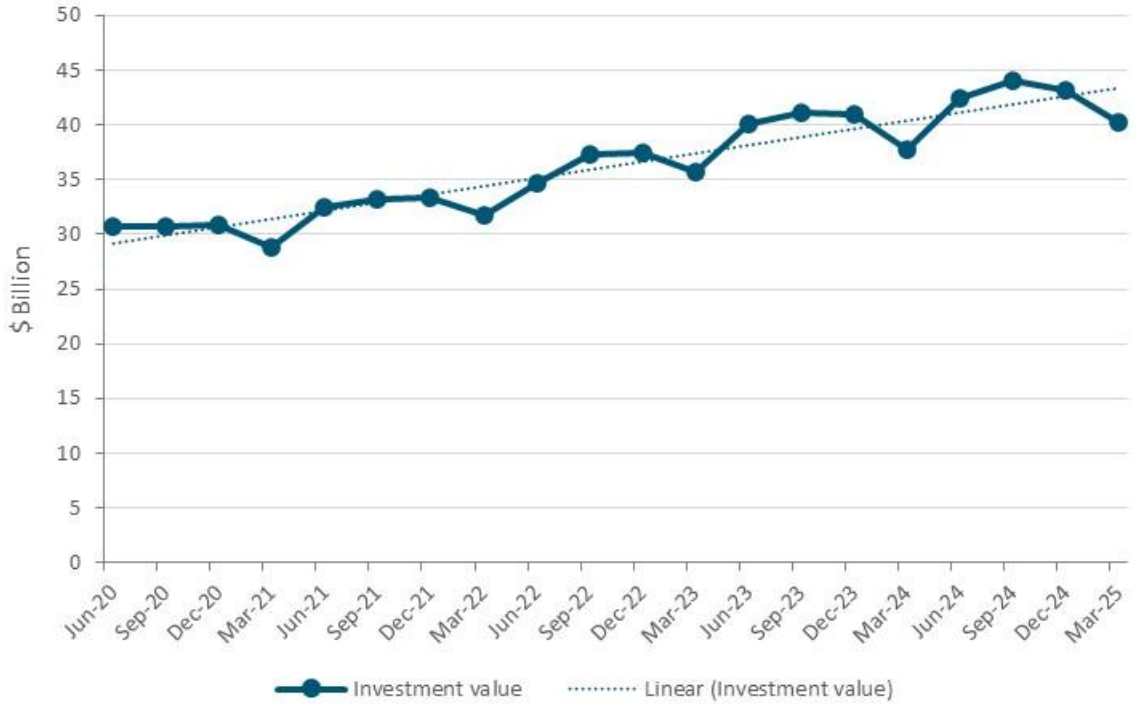

Figure 2: Building and construction sector in Australia, quarterly[52]

The historical building and construction trend continues to trend upward over time. During the period examined the sector exhibited an average Compound Annual Growth Rate (CAGR) of 5.59%, indicating steady long-term growth. After a peak in the September 2024 quarter the sector experienced a decline over the next two quarters but remained above the long-term trend. This suggests potential contraction of the market in the short-term (possibly reflective of interest rate and inflationary pressures), but long-term growth trajectory remains positive. The March quarter in any given year tends to have the lowest level of activity, reflecting a slowdown in activity around the new year period.

[52] Australian Bureau of Statistics (ABS) (March 2025), *Building Activity, Australia, (Table 12),* ABS Website, 16 July 2025, accessed 9 September 2025.

Figure 3 shows the total value of residential and non-residential building work from 1 April 2019 based on trailing 12-month periods (TTM). The inquiry period is coloured red.

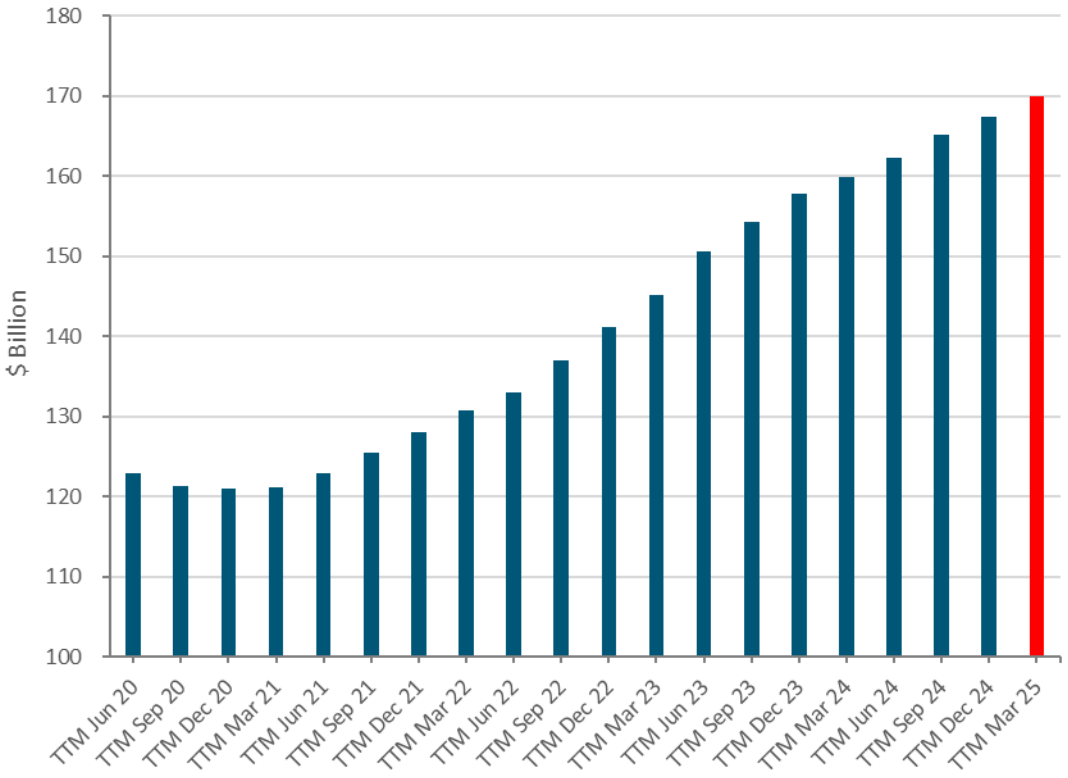

Figure 3: Building and construction sector in Australia[53]

After a slight decline between the 12 months ended June 2020 and March 2021 (likely due to economic uncertainty and disruptions caused by the COVID-19 pandemic[54]), growth has shown a steady and sustained upward trend for the remaining period, peaking in the 12 months ended 31 March 2025 ($169.9 billion). This steady increase in growth likely reflects a combination of factors, including post-COVID recovery stimulus, increased demand for housing, infrastructure and investment, as well as inflationary costs driving up the cost of construction. According to the ACIF and Housing Industry Australia (HIA), the sector is expected to remain resilient, supported by long-term infrastructure commitments, falling interest rates and housing demand.[55]

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[53] ABS (March 2025), *Building Activity, Australia, (Table 12),* ABS Website, 16 July 2025, accessed 9 September 2025.

[54] ABS (November 2024), *Home building through the pandemic; Residential building approvals and activity in Australia from 2019-2024,* ABS Website, 19 November 2024, accessed 9 September 2025.

[55] Australian Construction Industry Forum (ACIF), 'May 2025 Forecasts Released – Residential building recovery is gathering momentum', *ACIF website*, 22 May 2025, accessed 9 September 2025, and HIA, 'Home building gaining momentum', *HIA website*, 12 August 2025, accessed 9 September 2025.

4.5 Market competition

The commission examined the ABF import database and identified a number of importers of RIC from various countries. The commission did not identify any importations of the goods from China during the inquiry period or since 2020.

RIC used in Australia is predominantly manufactured to the same standard (Australian Standard AS 1442:2007) and used in the same applications (primarily an intermediary product transformed into wire mesh and used in construction applications). There is little to differentiate RIC from different suppliers if it is to be used in the same application.

Price (including any inland transport) is the primary differentiating characteristic that RIC suppliers can offer in the Australian market. Customers frequently purchase from multiple different suppliers (including InfraBuild Steel and exporters) and will reference pricing from different suppliers to obtain the best price.

As depicted in Figure 1, InfraBuild Steel competes with exporters, traders and importers for the sale of RIC.

4.6 Market size

The commission has estimated the size of the Australian market for each year ending 31 March for the period 1 April 2020 to 31 March 2025.

The commission's estimate is based on InfraBuild Steel's sales figures and ABF import data for the relevant tariff subheadings.[56] The commission considers the ABF import database to be a reliable source of data for imported RIC and that it is relevant and suitable for estimating the size of the Australian market for RIC.

Figure 4 depicts the commission estimate of the Australian market for RIC.

[56] Includes InfraBuild Steel's stock transfers to related parties for the purpose of assessing trends in the market. Without these transfers, the drop from Mar-22 to Mar-23 would be even greater.

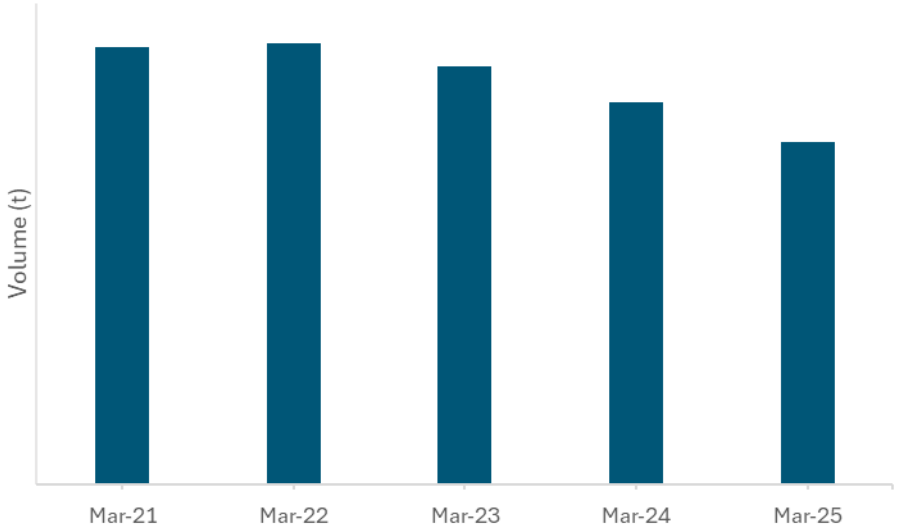

Figure 4: Australian market size

The Australian market has decreased in size from 1 April 2020 to 31 March 2025. Details of the Australian market size estimate is at **Confidential Attachment 1**.

4.7 Market pricing

The commission has established in previous cases that RIC is a commodity product, and provided the goods meet the grade requirements for the desired end use, there are limited ways in which suppliers can differentiate their product offering beyond price and service. InfraBuild Steel confirmed that this continues to be the case during the commission's verification visit.[57]

In the original investigation, the commission found that the Australian industry set its prices by applying an IPP model, whereby prices were negotiated with customers and established with reference to competing price offers in respect of imported goods. This model was actively applied until a new pricing model was introduced on 1 January 2020 for all RIC product specifications. This pricing model continues to be influenced by import prices in determining the final price, as well as monthly movements in ferrous scrap, among other factors.

InfraBuild Steel claims that it is generally able to command a small price premium for low volume RIC due to its ability to supply from stock holdings with shorter delivery timeframes compared to imported sources. Importers tend to compete mainly in the higher volume, mesh grade RIC product offering. Although the pricing for mesh grade RIC is more heavily influenced by import pricing, it is also a contributory factor in the pricing of non-mesh grade products.

Regardless of the pricing mechanism used, the Australian industry submitted that its prices in the market continue to reference imported RIC price offers.

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[57] EPR 675, no 5.

5 ECONOMIC CONDITION OF THE INDUSTRY

5.1 Finding

The commission has found that InfraBuild Steel has experienced a decline in its economic condition over the injury analysis period. In particular, InfraBuild Steel has experienced a decline in:

- sales volumes since YEM 2021
- market share since YEM 2021
- price depression and price suppression since YEM 2023
- profit and profitability since YEM 2023.

5.2 Background

As discussed in section 2.3, the measures are in the form of a dumping duty notice, and were first applied on 22 April 2016 following the original investigation.[58] The measures were continued for a further 5 years in April 2021 after completion of CON 562.[59]

An assessment as to whether the expiration of measures would lead, or would be likely to lead, to a continuation or recurrence of the material injury that the measure is intended to prevent involves a consideration of future outcomes based on an evaluation of the present position. To assist with that assessment, this chapter considers the economic condition of the Australian industry mainly since measures were last continued in April 2021.

The data in this report partially overlaps the inquiry period examined for CON 562 by 3 months. The Australian industry's economic condition prior to 2020 is outlined in REP 562.[60]

5.3 Approach to analysis

The examination in this chapter provides the basis for the commission's analysis in chapter 6 of whether material injury is likely to continue or recur.

The commission has assessed the economic condition of the Australian industry from 1 April 2020 to 31 March 2025 (the injury analysis period), using the verified information provided by InfraBuild Steel in this inquiry and previous cases, and data from the ABF import database. The commission has compiled the figures presented on an annual basis for years from 1 April to 31 March (YEM). This assessment is set out in **Confidential Attachment 1.**

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[58] Refer to ADN 2016/039.

[59] EPR 562, no 11.

[60] EPR 562, no 10.

5.4 Volume effects

The commission examined InfraBuild Steel's sales volumes as well as the volume of imports over the injury analysis period.

5.4.1 Sales volume

Figure 5 shows that InfraBuild Steel's sales volumes have shown a continual downward trend from the YEM 2021.

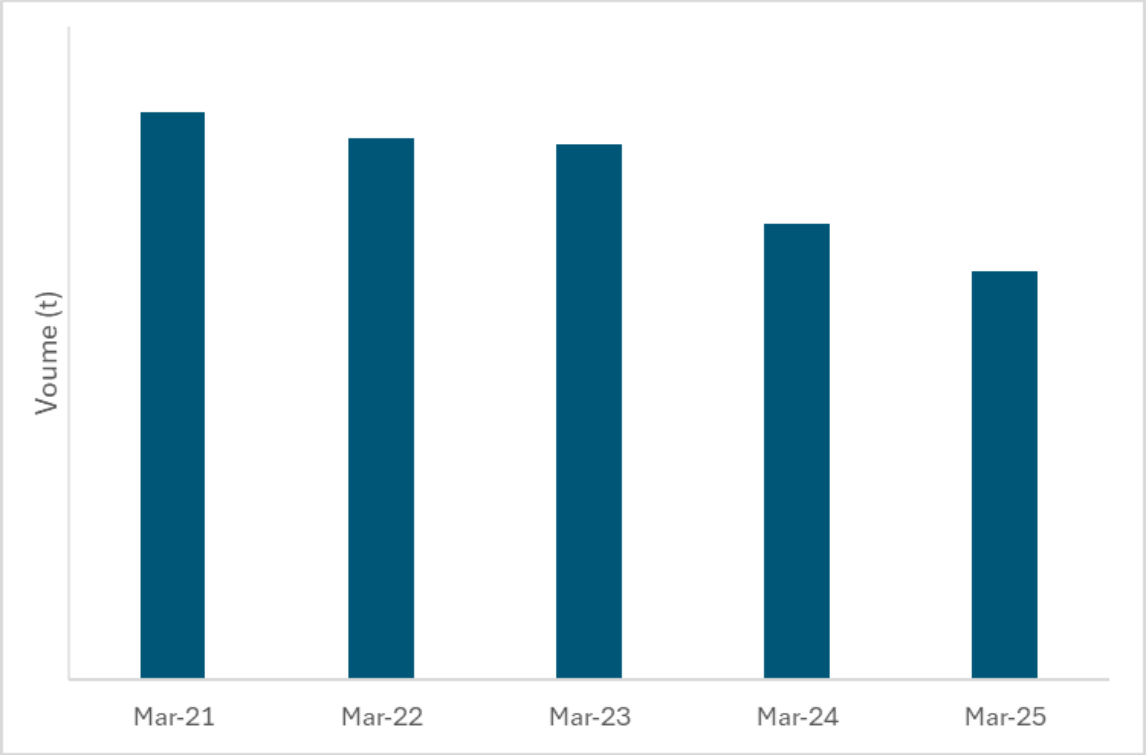

Figure 5: InfraBuild Steel sales volume[61]

[61] This figure includes stock transfers to related parties for the purposes of assessing trends. If these transfers were removed, there would be a more significant drop in sales volume.

5.4.2 Market share

The commission has estimated the Australian market share using InfraBuild Steel's sales data and ABF import data. This analysis is reflected in Figure 6 and demonstrates that InfraBuild Steel has experienced an overall decline in market share since the YEM 2021. InfraBuild Steel's reducing market share is also reflected in the downward trend in its sales volume (see Figure 5).

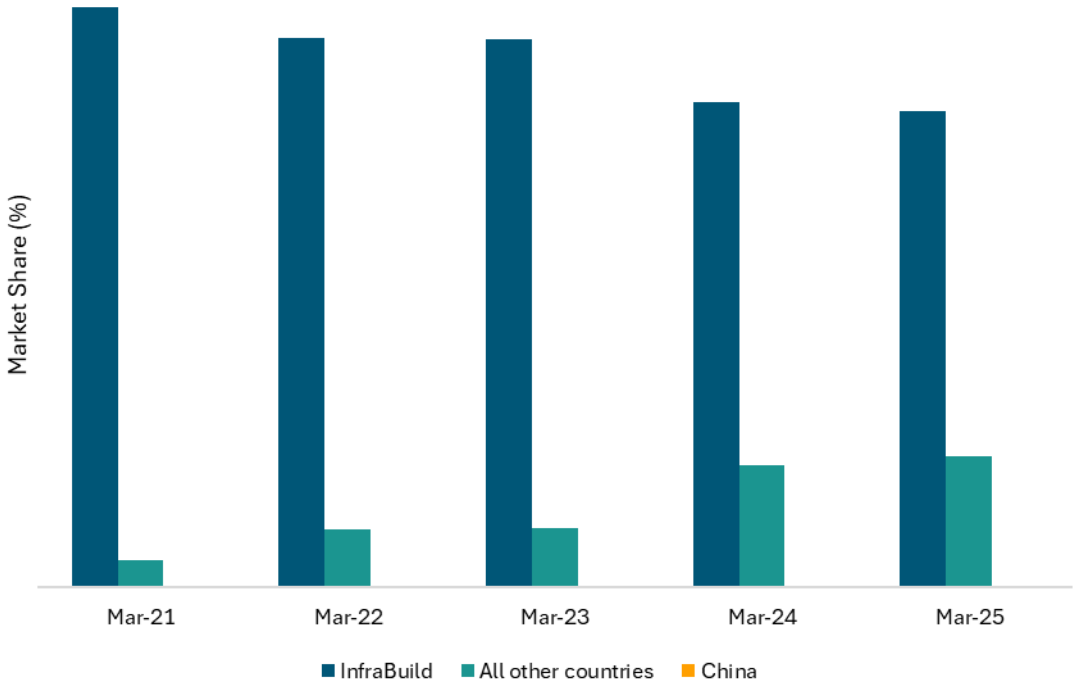

Figure 6: Australian market share

The commission observes that there has been an absence of imports subject to measures during the inquiry period (noting that China is the only country currently subject to any measures).

5.5 Price effects

5.5.1 Introduction

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

5.5.2 Price depression

The commission examined InfraBuild Steel's unit sales revenue to assess whether it had experienced price depression.

Figure 7 illustrates InfraBuild Steel's unit sales revenue over the injury analysis period. Figure 7 demonstrates that InfraBuild Steel's unit revenue peaked in YEM 2023, before declining in the following 2 years. This is indicative of InfraBuild Steel experiencing price depression in both YEM 2024 and YEM 2025.

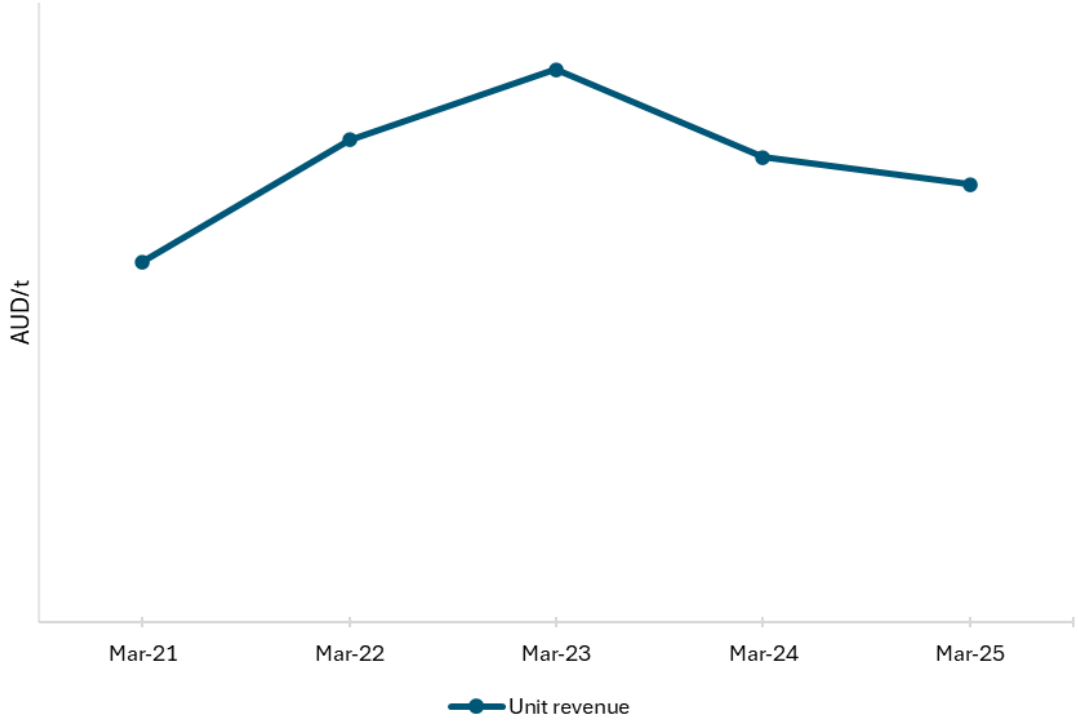

Figure 7: InfraBuild Steel unit revenue

5.5.3 Price suppression

The commission compared InfraBuild Steel's unit sales revenue and cost to make and sell (CTMS) over the injury analysis period to assess whether InfraBuild Steel had experienced price suppression.

Figure 8 shows that InfraBuild Steel's unit sales revenue exceeded unit costs across the injury analysis period. Unit pricing grew faster than unit CTMS over the first three years to YEM 2023. However, the margin narrowed in the final 2 years, indicating price suppression. The margin in YEM 2025 was the smallest margin achieved by InfraBuild Steel over the whole injury analysis period.

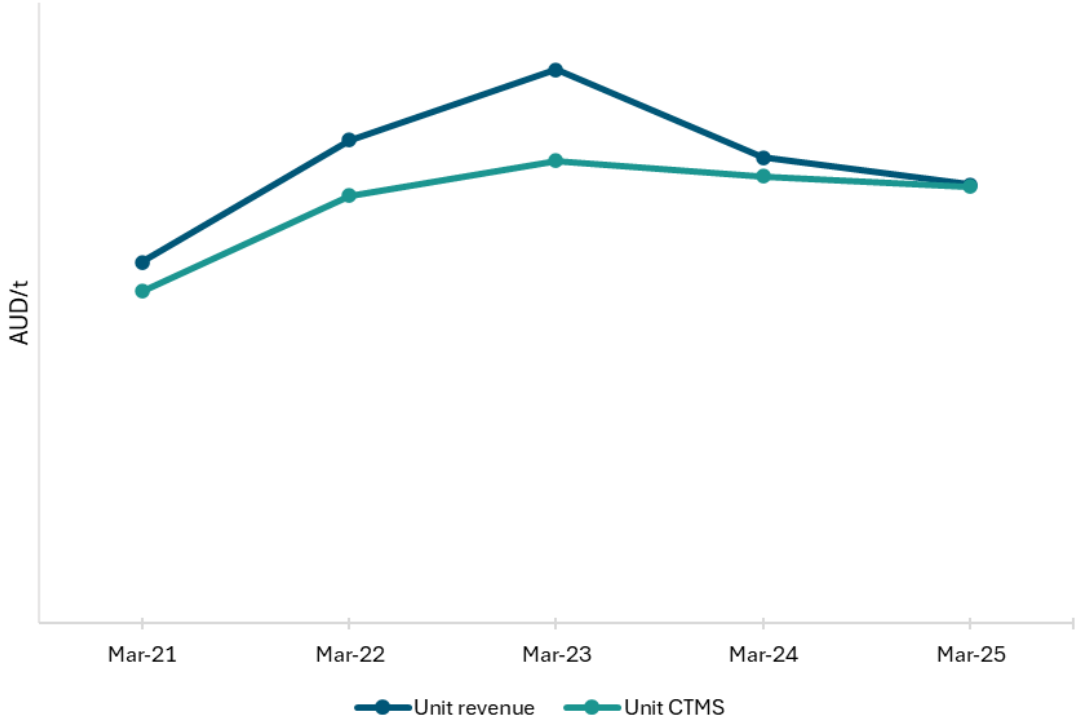

Figure 8: InfraBuild Steel unit revenue and CTMS

5.6 Profits and profitability

The commission examined InfraBuild Steel's unit profit and profitability over the injury analysis period. Figure 9 shows that InfraBuild Steel achieved net profits in each year of the analysis period, with strongest results in the period YEM 2021 to YEM 2023. InfraBuild Steel then experienced significantly lower profit and profitability in YEM 2024 and YEM 2025.

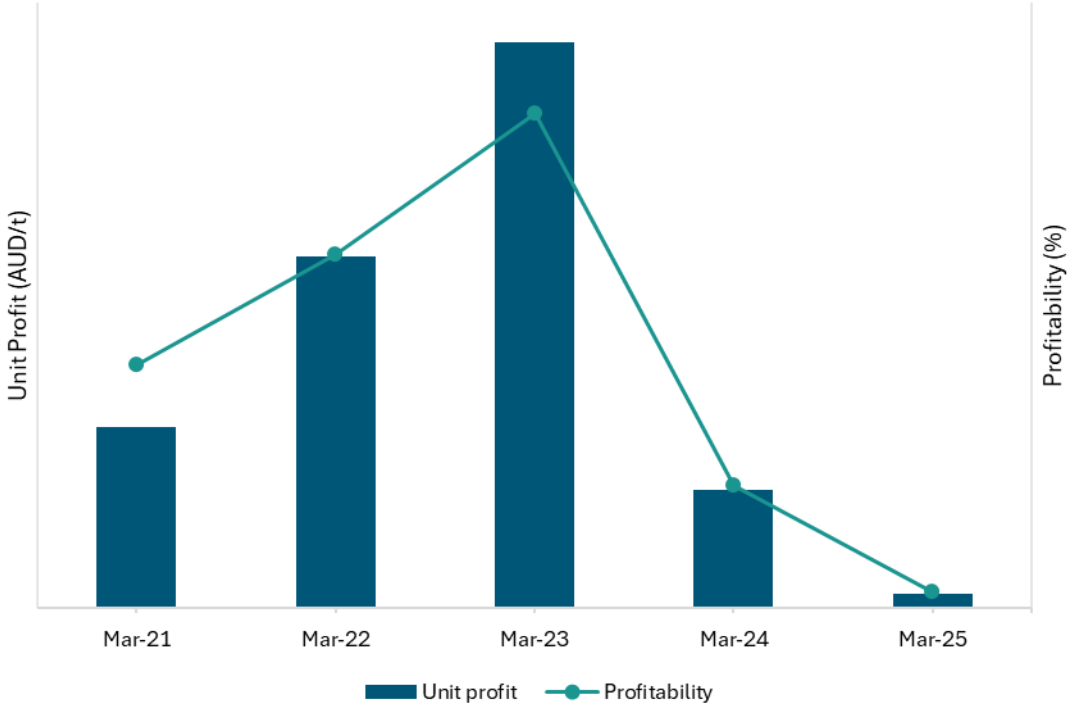

Figure 9: InfraBuild Steel profit and profitability[62]

[62] Profitability is the ratio of unit gain or loss compared to unit sales revenue.

5.7 Other economic factors

InfraBuild Steel provided information on a range of other economic factors to further underpin data submitted in its application to this inquiry. The data provided by InfraBuild Steel is summarised in Table 12.

Economic Factor	Mar-21	Mar-22	Mar-23	Mar-24	Mar-25
Capital Investment ($)	100	147	143	285	372
Assets ($)	100	111	112	111	122
R&D Expenditure ($)*	100	58	45	169	0
Revenue ($)	100	128	86	58	44
Return on Investment (%)	100	168	156	26	2
Maximum capacity (tonnes)[63]	100	96	100	101	94
Capacity Utilisation (%)	100	104	98	81	70
Employment (headcount)	100	124	133	122	115
Wages ($)	100	78	82	76	67
Productivity (tonnes per shift)	100	96	100	101	99
Closing Stock (tonnes)	100	159	221	157	137
Financing Costs ($)	-	100	137	178	162
Receivables Turnover	100	105	131	142	126
Inventory Days on Hand	100	165	200	273	256

Table 12: Summary of InfraBuild Steel's other economic factors

The commission has made the following observations regarding InfraBuild Steel's other economic factors concerning the production and sale of RIC:

- Capital investment and assets used in the production of like goods increased, although investment growth was greater than asset growth.
- R&D fluctuated significantly.
- Revenue showed an overall decline, which aligns with InfraBuild Steel's reduced sales volume (see Figure 5) and the reduction in unit revenue in the last 2 years of the analysis period (see Figure 7).
- Return on investment increased in the first 3 years before significantly reducing. This is reflective of the trend identified in InfraBuild Steel's profit and profitability (see Figure 9).
- Capacity utilisation showed a downward trend from YEM 2023 onwards.

[63] Rod and bar production (includes goods other than RIC).

- Productivity remained relatively consistent across the analysis period.
- Employment rose significantly in the first 3 years before declining over the 2 remaining years. Overall, employment numbers were higher at the end of analysis period than at the start. The trend for wages differed, demonstrating an overall decline over the analysis period.
- Closing stock was variable, reaching a high in YEM 2023 before falling over the last 2 years. Inventory days on hand ended higher over the analysis period, possibly reflecting the reduced sales volume.

6 LIKELIHOOD THAT DUMPING AND MATERIAL INJURY WILL CONTINUE OR RECUR

6.1 Finding

The Commissioner is satisfied that the expiration of the measures would lead, or would be likely to lead, to a recurrence of dumping and the material injury that the measures are intended to prevent.

After considering the commission's analysis and findings, the Commissioner is satisfied that the following would be likely to occur if the measures expire.

Exports of the goods will likely resume from China because:

- exporters have changed their behaviour in response to the measures
- exporters can readily establish distribution links in Australia
- exporters have excess production capacity that could be directed towards Australia
- excess production capacity in China is influencing market conditions in China, placing pressure on its exporters to seek out export markets
- trade measures in other jurisdictions would make Australia a more attractive export market for exporters from China in the absence of measures.

Dumping will likely continue or recur because:

- the goods were assessed to likely have been dumped if they were exported during the inquiry period
- the goods were dumped in the original investigation, and the periods examined in subsequent reviews
- the price sensitive nature of the Australian RIC market promotes a high level of competition between exports
- the goods have been found to be dumped by other jurisdictions.

Material injury that the measures are intended to prevent will likely continue or recur because:

- dumped exports from China would likely reduce InfraBuild Steel's sales volumes
- dumped exports from China would likely supress or depress InfraBuild Steel's prices as:
  - the expiry of measures would provide exporters from China with a price advantage in a price-sensitive market
  - InfraBuild Steel has considerable regard to import prices through its IPP model
  - a reduction in import prices as exporters seek to compete in a market absent of measures would place downwards pressure on InfraBuild Steel's prices.

6.2 Legislative framework

Under section 269ZHF(2) the Commissioner must not recommend that the Minister take steps to secure the continuation of measures unless they are satisfied that the expiration of the measures would lead, or would be likely to lead, to a continuation of, or a recurrence of, the dumping and the material injury that the measure is intended to prevent.

The commission notes that its assessment of the likelihood of certain events occurring and their anticipated effect, as is required in a continuation inquiry, necessarily requires an assessment of a hypothetical situation. The commission must consider what will happen (or what would be likely to happen) in the future should a certain event, being the expiry of the measures, occurs. However, the Commissioner must nevertheless base their conclusions and recommendations on facts.[64]

6.3 The commission's approach

The commission considered several relevant factors to assess the likelihood that dumping and material injury would continue or recur, as outlined in the Manual.[65] The commission's view is that the relevance of each factor varies depending on the nature of the goods and the market into which the goods are sold. In this instance, no one factor can provide decisive guidance. The following analysis therefore examines a range of factors that the commission considers relevant to this inquiry.

In assessing whether the measures should be continued, the commission has had regard to the following information:

- data provided by InfraBuild in the application
- ABF import data
- data provided by InfraBuild Steel as part of the verification
- data sourced from third-party providers
- other sources as referenced in this section.

The Commission did not receive a completed questionnaire response from any potential exporter from China or the GOC.

The commission's analysis for this chapter is at **Confidential Attachment 2**.

6.4 Australian industry claims

In its application, InfraBuild made the following claims regarding the continuation or recurrence of injury in the absence of measures:

- The Australian market remains an attractive destination for exporters, as demonstrated by the large import volumes from countries not subject to the measures.
- Former importers and customers of goods sourced from China have maintained distribution links to the Australian market – for example, via imports of competing products such as reinforcing steel mesh.
- Whilst the export of RIC from China to Australia has ceased since the application of measures in April 2016, exports to New Zealand surged following this. This pattern indicates that Chinese exporters have demonstrated a capacity to rapidly shift trade to unprotected markets.

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[64] ADRP Report No. 44 (Clear Float Glass).

[65] The Manual, pp 137-138.

- Price undercutting trend analysis identified that Chinese export prices to New Zealand undercut the quarterly weighted average of Australian selling prices during the proposed inquiry period by more than 3-times the price undercutting margin identified in the prior analysis period (1 January 2015 to 31 December 2023).
- There are allegations of product circumvention through a slight modification of the goods (the circumvention goods), which have been exported from China to Australia during the inquiry period.[66]
- The sharp decline in Chinese import volumes following the imposition of measures indicates that Chinese exporters were unable to compete in the price-sensitive Australian market without dumping, suggesting that removal of measures would likely lead to renewed dumping and recurrence of injury.
- Exporters from the subject country maintain surplus RIC export capacity and crude steel production capacity.
- The size and demand conditions within the Australian RIC market remain stable.
- The Australian RIC market remains highly price sensitive and is largely influenced by import competition pricing.

InfraBuild claimed therefore that it is reasonable to expect that the expiration of the measures would lead, or would be likely to lead, to a continuation of material injury that the measures were intended to prevent. The commission did not receive any submissions regarding the claims made by InfraBuild.

The commission has considered InfraBuild's claims in its analysis below.

6.5 Are exports likely to continue or recur?

The commission considers that, should the measures expire, exports from China are likely to recur. This finding is based on the following significant factors:

- the Australian market remains an attractive destination for exporters of RIC, as demonstrated by the large volume of imports from countries not subject to the measures
- exporters from China changed their behaviour in response to the measures and discontinued exporting
- exporters from China can readily establish distribution links in the Australian market
- exporters from China have excess production capacity that could be directed towards Australia
- excess production capacity in China is influencing market conditions in China, placing pressure on exporters to seek out export markets, including Australia
- trade measures in the United States of America (USA) and European Union (EU) would make Australia a more attractive export market for exporters from China in the absence of measures

[66] The commission assessed this claim as part of *Anti-Circumvention Inquiry No 643*. The commission did not find that circumvention activity had occurred. Refer to EPR 643, no 31.

- Australian consumers of RIC are sensitive to price and have demonstrated in the past they would likely source the goods from China in the absence of the measures.

In coming to these findings, the commission has assessed:

- import volumes
- maintenance of distribution links
- excess production capacity in China
- imports of reinforcing steel mesh
- availability of other markets.

6.5.1 Import volumes

The commission assessed import volumes from all sources, including China, from January 2013, before the measures were imposed. The pattern of trade observed before and after the imposition of the measures, and the effect the measures had on import volumes, are discussed below.

Figure 10 shows the annual import volumes of RIC for each year ending 31 March (YEM) from China. Exports from China ceased once measures were introduced on 22 April 2016.

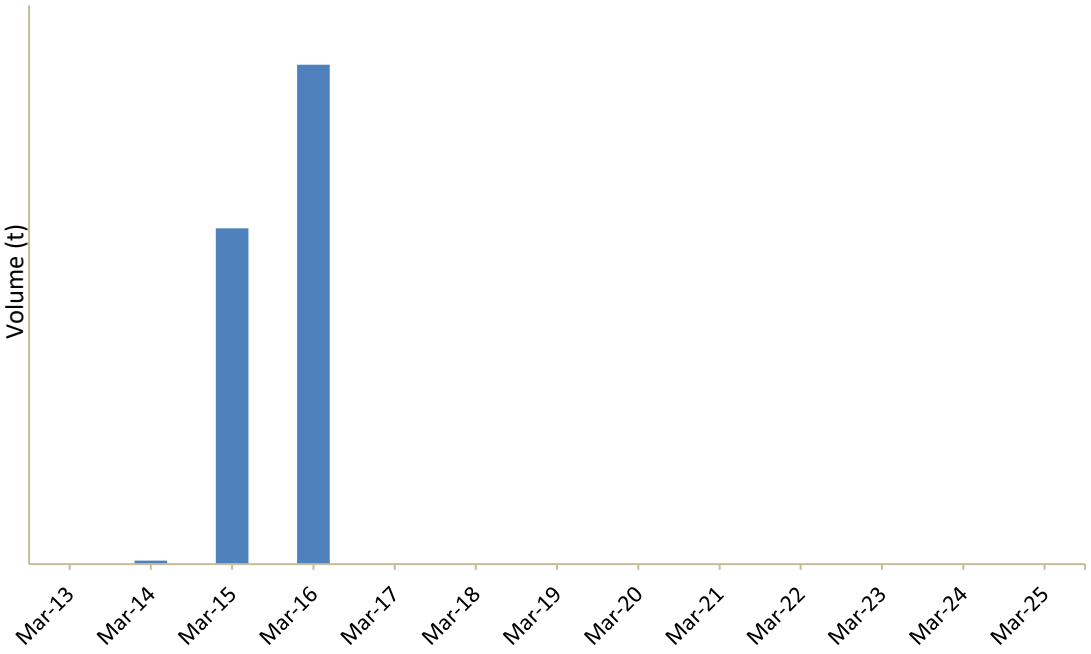

Figure 10: Total imports of RIC from China

Figure 11 shows the annual import volumes of RIC for each YEM from China and other sources.[67]

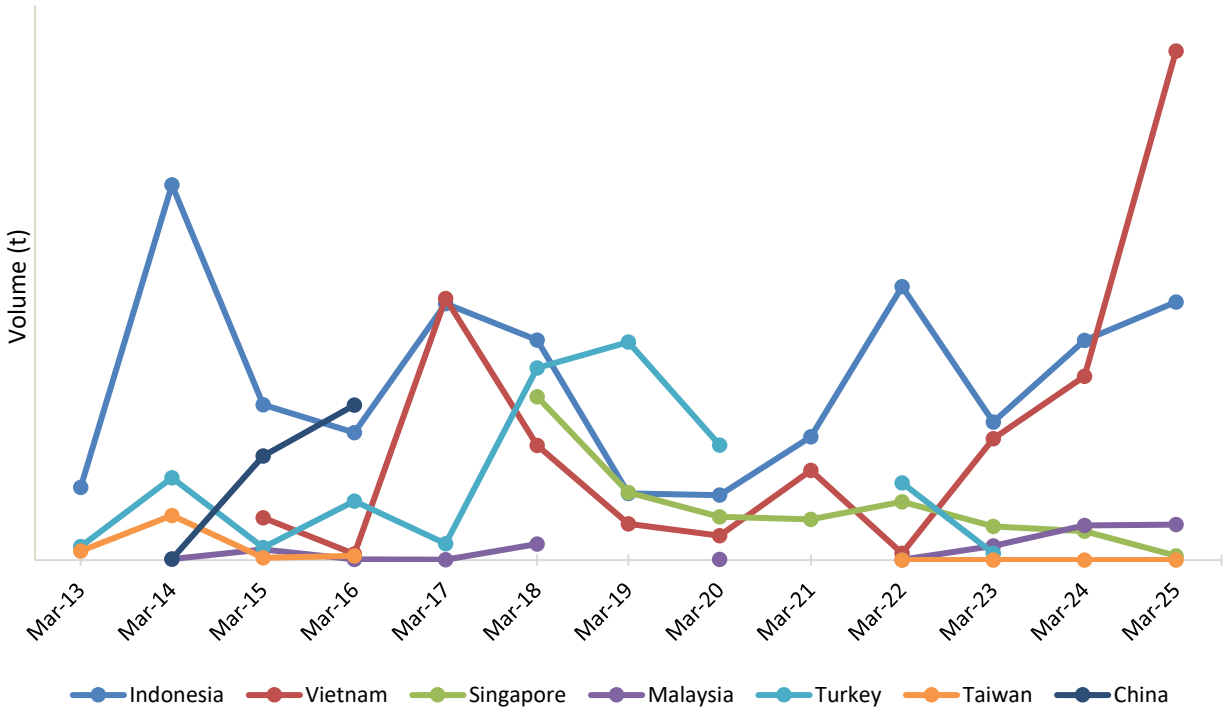

Figure 11: RIC imports to Australia by country

Figure 11, and the underlying data supporting it, indicates that:

- imports from China effectively ceased following the imposition of measures in YEM 2017
- imports from Taiwan also ceased in YEM 2017
- imports from China were replaced by import volumes from other sources not subject to the measures, most notably Indonesia, the Socialist Republic of Vietnam (Vietnam), and Türkiye.[68]

The rapid increase in imports from Vietnam demonstrates that new supply sources can quickly emerge in response to measures. This supports that Australia is an attractive market for exporters of RIC, and that importers can alter their supply channels relatively quickly in response to the imposition of measures.

The commission's analysis demonstrates that measures have influenced import volumes and patterns of trade in the Australian market.

[67] Taiwan was included as it was subject to measures from 17 June 2015 to 18 June 2020.

[68] Indonesia was subject to measures from 17 June 205 to 22 August 2016.

The commission considers that this supports a finding that if the measures were to expire, exports from China would likely resume. Furthermore, given the demonstrated ease at which supply sources have changed in the past, it is likely that import volumes for China would grow significantly.

6.5.2 Maintenance of distribution links

The commission's analysis of the ABF import database indicates that during the inquiry period there was an insufficient quantity of goods imported to determine whether Chinese distribution links had been maintained with particular customers. However, the commission considers that it likely that Australian importers would resume their trading links with exporters from China should the measures expire.

In its application for CIR 643, InfraBuild presented evidence that customers and importers who previously purchased the goods from China have shifted to buying reinforcing steel mesh.[69] Whilst not the focus of this inquiry, the commission as part of CIR 643 considered this evidence and found that each good, being RIC or mesh, is exported to Australia by different exporters and manufacturers in the majority of instances. Whilst some exports of mesh are made via the same importers of RIC (steel traders) the channels of trade and distribution is not considered the same, or an alternate link. The commission has further examined imports of reinforcing steel mesh in section 6.5.4.

However, as demonstrated at Figure 11, importers can quickly switch supply of RIC from alternate sources. The commission also found that importers who had previously sourced the goods from exporters of RIC in China imported the goods from other countries during the inquiry period. One of the largest importers of RIC from China remains one of the top 5 importers of RIC from other countries.

6.5.3 Excess production capacity

The commission did not receive information concerning capacity and capacity utilisation from Chinese exporters of RIC during this inquiry.

In INV 301 and CON 562 the Commission found that there was substantial excess capacity within the Chinese steel industry.[70]

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[69] EPR 643, no 1, Annexure.

[70] *Anti-Dumping Commission Report No 301* (EPR 301) and *Anti-Dumping Commission Report No 562* (EPR 562).

In assessing whether levels of excess capacity remain in China, the commission has had regard to the Organisation for Economic Co-operation and Development (OECD) Steel Outlook 2025 (*OECD Steel Outlook 2025*).[71] The *OECD Steel Outlook 2025* indicated that China continues to exhibit the largest excess steel production capacity (driven by continued expansion), despite slowing domestic and global demand. While global steel demand is projected to grow only modestly (around 0.7% annually), China continues to add to its capacity. This mismatch has led to a surge in Chinese steel exports, which reached 118 million metric tonnes of steel in 2024, more than double its 2020 volume. This oversupply is distorting international markets, as evidenced by increasing trade actions in multiple countries (81 cases across 19 countries in 2024 alone of which China is a subject country in over a third of these).

Further, reporting indicates that Chinese exports of wire rod have increased from China.[72] One of the reasons for the increase in exports is a response to decreasing demand in China, stemming from a weak property industry. The commission considers that this is indicative of Chinese exporters looking to utilise production capacity by increasing exports.

Based on the information available, the commission considers it is reasonable to conclude that significant levels of excess production capacity exist in China, and that exporters from China would resume exporting the goods to Australia should the measures expire.

6.5.4 Imports of reinforcing steel mesh

The commission considers that a clear shift in exports from RIC to reinforcing steel mesh supports a finding that exports of RIC are likely to resume if the measures expire.

As part of its application, InfraBuild submitted that exports of RIC from China had been replaced by exports of reinforcing steel mesh.[73] InfraBuild claims related to the then ongoing CIR 643, and that the export of mesh was a form of circumvention of the measures on RIC. The commission found that exports of reinforcing steel mesh did not constitute circumvention activity.[74] Following this outcome, InfraBuild and the Steel Reinforcement Institute of Australia (SRIA) together lodged an application for a separate investigation into the dumping of certain welded steel mesh sheets exported to Australia from China.[75] INV 692 was subsequently initiated by the commission on 25 November 2025.[76]

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[71] OECD (2025), *OECD Steel Outlook 2025*, OECD Publishing, Paris, https://doi.org/10.1787/28b61a5e-en [PDF refers].

[72] J Zong, 'China's long steel exports surge in Q1, boosting prices', *Fastmarkets website*, 2 May 2025, accessed 19 November 2025.

[73] EPR 675, no 1, Non-confidential attachment - Annexure A - Reasons for Continuation of anti-dumping measures applying to rod in coil from China.

[74] EPR 643, no 31 (*Anti-Dumping Commission Report No 643*).

[75] EPR 692, no 1.

[76] EPR 692, no 3.

Given the initiation of INV 692 and the increase in reinforcing steel mesh imports from China identified in CIR 643, the commission considers it relevant to examine the apparent shift in export patterns, namely, the move to exporting reinforcing steel mesh products at allegedly dumped prices rather than the intermediary RIC input (currently subject to measures), and assess whether exports of RIC are likely to resume if the measures expire.

Figure 12 shows imports of reinforcing steel mesh and RIC from China. There is a clear shift in imports from RIC to reinforcing steel mesh following the imposition of measures applying to RIC in YEM 2017.

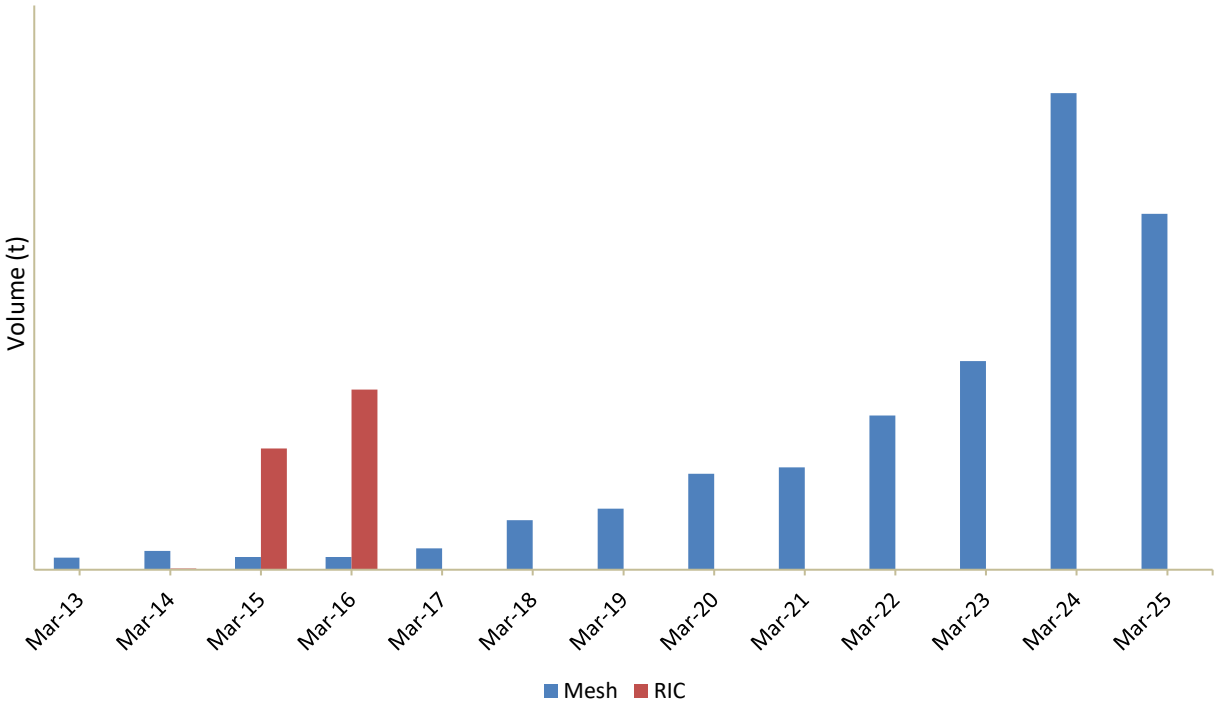

Figure 12: Imports of reinforcing steel mesh and RIC from China

InfraBuild Steel submitted that this shift is due to the price competitiveness of reinforcing steel mesh over RIC subject to the measures. In CIR 643, the commission found that the cost to modify RIC into reinforcing steel mesh in China was 'not insignificant'.[77] Accordingly, reinforcing steel mesh imports command a higher price than RIC. However, with the presence of duties, the gap between the imported price of RIC and reinforcing steel mesh is reduced. It is clear from Figure 12 that this gap has reduced to such an amount that importers consider it more cost-effective to import reinforcing steel mesh directly rather than import the RIC subject to measures and convert to reinforcing steel mesh.

The commission compared the following prices from China:

- Free On Board (FOB) price of mesh from ABF import data.

[77] EPR 643, no 31, section 4.4.2.6.

- FOB price for RIC from Bloomberg LP, plus current dumping duty.[78]

The commission found that the FOB price for RIC, plus current dumping duty was higher than the FOB price for reinforcing steel mesh in the inquiry period. The commission considers that if the measures expire, it will shift the relative cost difference back in the favour of RIC, likely resulting in a resumption of imports of RIC from China.

6.5.5 Availability of other markets

InfraBuild outlined in its application that anti-dumping measures have also been imposed on exports of the goods from China by:

- Canada (measures in force since 2024)
- the USA (measures in force since 2015)
- the United Kingdom (measures in force since 2021)
- the EU (measures in force since 2009)
- Mexico (measures in force since 2016)
- the Kingdom of Thailand (Thailand) (measures in force since 2014).

The commission also notes that there has been considerable volatility and uncertainty in relation to recent US trade policy and that the longer-term impact of these policies may take some to time to unfold.

In addition to anti-dumping measures, the commission notes that other jurisdictions are imposing measures such as the EU's Carbon Border Adjustment Mechanism (CBAM).[79] At a high-level, the CBAM will impose a tariff on imports of certain products (including steel) which have high levels of embedded emissions. There is also a lengthy administrative process for importers to identify and report the levels of direct and indirect emissions in the products they import. The full CBAM is due to take effect in the EU on 1 January 2026. The commission considers that the introduction of the CBAM will likely reduce the attractiveness of exporting to the EU, particularly from China where the majority of steel production is carbon intensive.

Noting these factors, the Commissioner considers that anti-dumping and other trade measures applying in other jurisdictions may result in exporters from China seeking alternative export markets. This shift in the availability of other export markets means that RIC normally exported to other markets may be diverted to Australia in the absence of measures.

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[78] Confidential Attachment 2.

[79] The purpose of the CBAM is to account for embedded carbon emissions in imported products. See European Commission (EC), *Carbon Border Adjustment Mechanism*, EC website, n.d., accessed 19 November 2025.

6.6 Will dumping continue or recur?

The commission considers that the expiry of the measures would be likely to lead to a continuation of dumping of RIC from China. This finding is based on the following significant factors:

- if the goods had been exported during the inquiry period they would likely have been dumped
- the goods were dumped in the original investigation, and would likely have been dumped if exported in the periods examined in subsequent reviews (based on export price and normal value calculations)
- the price sensitive nature of the Australian RIC market promotes a high level of competition between different sources of supply
- the goods have been found to be dumped in other jurisdictions.

In coming to these findings, the commission has assessed:

- likely dumping in the inquiry period
- previous dumping margin assessments
- an assessment of the competitiveness of prices not subject to measures
- anti-dumping actions in other jurisdictions.

6.6.1 Assessment of dumping during the inquiry period

To assess whether dumping is likely to recur, the commission has examined whether goods exported from China would have been dumped if exported to Australia from China during the inquiry period based on the export price and normal value of the goods calculated for this inquiry. Details of the export price and normal value calculations are in chapter 7.

Table 13 outlines the commission's assessment of the dumping margins in the inquiry period based on the changes to the export price and normal value. The commission considers that the goods would likely have been dumped if they were exported to Australia during the inquiry period.

Country	Exporter	Dumping margin
China	All exporters	13.9%

Table 13: Summary of dumping assessment

6.6.2 Previous dumping margin assessments

The commission considers that the past behaviour of dumping by exporters from China is an indicator that dumping is likely to resume if the measures expire. Table 14 summarises the history of dumping margin findings associated with exporters from China.

Exporter	Investigation 301	Review 413/414	Review 468	Review 564
Hunan Valin Xiangtan Iron & Steel Co., Ltd	44.1%	24.3%	All exporters reverted to uncooperative and all other exporters rate	All exporters reverted to uncooperative and all other exporters rate
Jiangsu Shagang Group Co., Ltd	37.4%	24.2%		
Uncooperative and all other exporters	53.1%	No change	39.5%	33.1%

Table 14: Previous dumping margins

The commission has found dumping margins for all Chinese exporters of RIC to Australia have been consistently high while the measures have been in place. Following *Review 468* all exporters reverted to a single dumping margin.[80]

The commission considers that the consistency in previous dumping findings supports a finding that dumping from China is likely to resume if the measures expire.

6.6.3 Estimate of competitiveness of prices not subject to measures

The commission considers that if exports from China were to resume, they would likely be at dumped prices to compete with exports from countries not subject to the measures.

As noted in chapter 4, the Australian market is supplied by exports from numerous countries. The commission has undertaken a comparison of prices to inform its findings about the likelihood of dumping by China should the measures expire.

The commission's sample included the 5 largest exporting countries by volume since the measures were last continued, as well as China and Taiwan. Exports from these 5 largest exporting countries accounted for over 98% of all imports into Australia since the measures were last continued.

The commission compared the FOB prices for each of these countries across the inquiry period. There were no exports from China during the inquiry period and there were no measures applying to any other country. Accordingly, the commission considers that FOB price is the most appropriate basis to assess whether dumping is likely to continue. This is because there are no dumping duties to account for in respect of exports from other countries.

[80] Refer to ADN 2019/011.

To assess the competitiveness of exports from China, the commission used third-party data relating to the FOB prices of wire rod from China.[81] The commission compared the FOB prices for China to FOB prices for Indonesia and Vietnam, the two largest import sources during the inquiry period. The commission found that FOB prices from China undercut Indonesian and Vietnamese FOB prices by 4% to 17% each quarter of the inquiry period.

As outlined in section 6.6.1, the commission considers that it is likely that exports from China would have been dumped during the inquiry period.

The commission considers that the competitiveness of Chinese FOB prices at prices that are likely dumped indicates that Chinese exports of RIC are not competitive at undumped prices. If Chinese FOB prices were to increase (a requirement to avoid dumping), they would be uncompetitive with prices from Indonesia and Vietnam.

6.6.4 Anti-dumping actions in other jurisdictions

As noted in section 6.5.5 of this report, anti-dumping measures are in place against exports of the goods from China to:

- Canada
- the USA
- the United Kingdom
- the EU
- Mexico
- Thailand.

The Commissioner considers that this is indicative of the preparedness and willingness of exporters from China to export at dumped prices to secure sales.

6.7 Will material injury continue or recur?

The commission considers that the expiry of the measures would be likely to lead to a recurrence of material injury that the measures are intended to prevent. This finding is based on the following significant factors:

- Exports from China would recur, impacting InfraBuild Steel's sales volumes.
- InfraBuild Steel has considerable regard to import prices through its IPP model.
- The expiry of measures would provide exporters from China with a price advantage in a price-sensitive market.
- A reduction in import prices as Chinese exporters seek to compete in a market absent of measures would place downwards pressure on InfraBuild Steel's prices.
- In the absence of measures, dumped imports from China would likely undercut Australian industry pricing, leading to a recurrence of price suppression and depression, and a material decline in revenue and profit.

[81] The commission considers wire rod and RIC to refer to the same product. This is the same data used to determine an export price for all exporters from China. Refer to chapter 7. The data was sourced from Bloomberg LP.

In coming to these findings, the commission has assessed:

- the likely effects on InfraBuild Steel's sales
- the likely effects on InfraBuild Steel's prices
- other injury factors.

6.7.1 Sales analysis

The commission considers that InfraBuild Steel is likely to experience a further market share reduction if the measure expire.

The commission analysed import volumes and the market share of the key market participants since 2013 to inform its consideration of the likely effect on import volumes and InfraBuild Steel's sales should the measures expire.

Figure 13 shows an index of the movements in InfraBuild Steel's market share compared to the market share of imports and overall Australian market size. InfraBuild Steel has lost market share at a time when the Australian market also decreased in size, but not to the same extent. This also coincides with an increase in the market share held by imports.

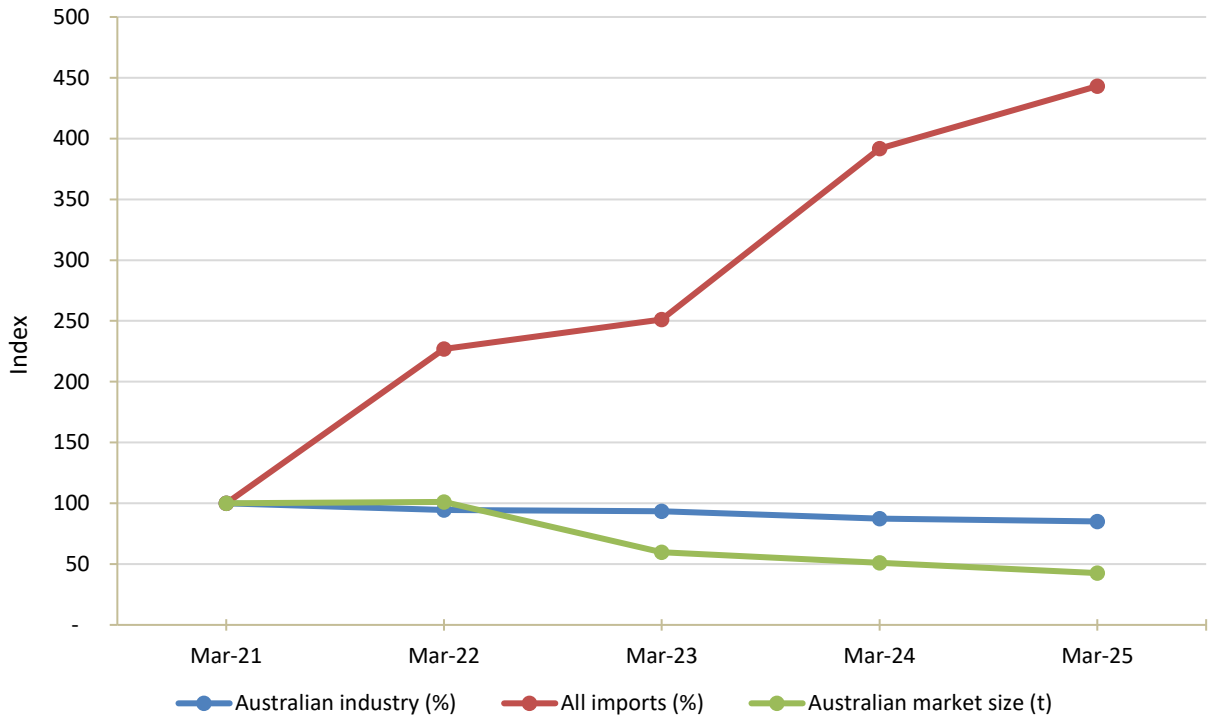

Figure 13: Index of movements in market share and market size

The commission considers this shift indicates that demand for imports is increasing. In this environment (and noting the outlook is for demand to stabilise and improve moving forward), removing measures on Chinese imports could lead to renewed competitive pressure from low-priced imports. Given China's previously demonstrated capacity to supply significant volumes at lower prices, the absence of measures could lead to further pressure on competition and pricing. This would likely result in InfraBuild Steel being vulnerable to losing further sales volume and market share to dumped imports from China.

Despite shifts in trade patterns following the imposition of measures, the underlying conditions of competition in the Australian market have not materially changed. Price continues to be the primary factor influencing buyer behaviour. The commission considers that, if measures were to expire, Chinese exports of the goods would likely regain a competitive price advantage. This would then lead to increased import volumes and a further shift in purchasing behaviour toward lower-priced imports.

6.7.2 Pricing analysis

The commission considers that it is likely that InfraBuild Steel would experience price suppression or depression if the measures expire.

The commission has previously established that the price of imported goods has an influence on the price levels that Australian industry can achieve. In the original investigation, the commission found that Chinese exports of RIC were the lowest in the market at that time. Whilst exports from China did not continue following the imposition of measures, the commission still came to a similar position in Continuation 562 where it was identified that if China had continued to export the goods to Australia it would have had the lowest FOB export price in the Australian market.

To inform the commission's consideration of the likely effect on prices should the measures expire, the commission has conducted an undercutting analysis.

InfraBuild Steel's sales in Australia are made on Free Into Store (FIS) terms. To conduct the undercutting analysis, the commission has estimated Chinese prices for RIC at FIS terms. The commission did not identify any cooperative exporters or exports of the goods from China during the inquiry period.

To estimate an FIS price, the commission has used:

- FOB price data relating to wire rod sourced from a third-party provider[82]
- weighted average ocean freight and marine insurance for imports of steel reinforcing bar from China[83]
- InfraBuild Steel's weighted average inland transport costs
- weighted average SG&A for imports of steel reinforcing bar.[84]

The commission found that the estimated Chinese prices undercut InfraBuild Steel's prices from 7% to 14% over the inquiry period. The commission's analysis is contained in **Confidential Attachment 3**.

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[82] The commission considers wire rod and RIC to refer to the same product. This is the same data used to determine an export price for all exporters from China. Refer to chapter 7.

[83] Date sourced as part of *Continuation Inquiry 669*. The commission considers that steel reinforcing bar is the closest surrogate in the absence of imports of RIC.

[84] Data sourced from CON 660. The commission considers that steel reinforcing bar is the closest surrogate in the absence of imports of RIC. The commission did not include an amount for importer profit as importers were found to be unprofitable in CON 660.

During the verification, InfraBuild Steel provided the commission with evidence that the price of imports had negatively impacted its negotiations with customers. InfraBuild Steel also provided evidence that it had to change its prices in response to imports more generally. This evidence is contained in **Confidential Attachment 4**.

On the basis that the commission has established that InfraBuild Steel's customers utilise import prices to negotiate price, the commission considers it likely that the price of RIC from China would also be referenced by InfraBuild Steel's customers if the measures expire.

With the estimated undercutting margins, the commission considers the price of RIC from China would afford exporters from China a significant price advantage over InfraBuild Steel. As a result, the commission considers that the price of the goods exported from China would likely have a depressive effect on InfraBuild Steel's prices. The commission therefore considers it likely that InfraBuild Steel would experience a recurrence of the injury in the form of price depression, price suppression, and reduced profit and profitability if the measures expire.

6.7.3 Other injury factors

The commission examined whether the submissions of interested parties, or any other evidence, substantiated the existence of other factors that could effectively sever the link between the expiration of the measures on the one hand, and a likely recurrence of material injury on the other.

As detailed in section 6.5.1, Chinese exports of RIC had a strong presence in the Australian market until the introduction of measures in April 2016. Following the imposition of measures, import volumes from China declined significantly and have remained at zero levels. The commission's analysis of trade flows shows that importers have responded to the imposition of measures and changes in relative pricing by switching supply sources, particularly among steel traders who operate on tight margins and are not bound by long-term contracts. This behaviour reflects the price-sensitive nature of the Australian market and the ability of importers to adjust sourcing strategies quickly.

The commission accepts that the presence of imports from other sources not subject to measures may continue to exert competitive pressure on InfraBuild Steel. However, the existence of other contributing factors does not negate the injury that the industry is likely to experience from the continuation or recurrence of dumped exports from China. While injury caused by other factors should not be attributed to dumping, it is also noted that dumping need not be the sole cause of injury for the commission to find a likelihood of material injury.

The commission considers that the contraction in Chinese import volumes following the imposition of measures demonstrated that Chinese exporters were unable to maintain competitiveness without the benefit of dumping. As examined in section 6.6.3, the commission found that in the absence of measures, China would likely become a price leader in the Australian market. This is evidenced by Chinese FOB prices undercutting prices from Indonesia and Vietnam (the two largest export sources) over the inquiry period.

The commission therefore considers that if the measures expired, exporters from China would again benefit from a price advantage from dumping. While InfraBuild Steel will still face competition from exports from other sources as it did during the inquiry period, the commission considers that the presence of dumped exports from China that are likely to recur if the measures expire will likely supress or depress InfraBuild Steel's prices.

6.7.4 Australian industry submission in response to SEF 675

In its submission dated 12 January 2026, InfraBuild Steel expressed support for the commission's preliminary findings in SEF 675 that the Australian industry remains susceptible to material injury caused by dumped exports and that the expiry of the measures would be likely to lead to a continuation or recurrence of dumping and the material injury the measures are intended to prevent.[85]

[85] EPR 675, no 9.

7 VARIABLE FACTORS – EXPORT PRICE AND NORMAL VALUE

7.1 Finding

The Commissioner finds that the export price and normal value, variable factors relevant to the determination of dumping duties payable under the *Customs Tariff (Anti-Dumping) Act 1975 (Cth)* (the Dumping Duty Act), have changed.

7.2 Legislative framework

7.2.1 Continuation inquiries

Under section 269ZHF(2), the Commissioner must not recommend that the Minister take steps to secure the continuation of anti-dumping measures unless the Commissioner is satisfied that the expiration of the measures would lead, or would be likely to lead, to a continuation of, or a recurrence of, dumping.

If the Commissioner recommends that the Minister takes steps to secure the continuation of the measures, the Commissioner must decide whether the notice should be altered. The Commissioner may recommend one or more of the following:

(i) that the notice remain unaltered
(ii) that the notice cease to apply to a particular exporter or to a particular kind of goods, or
(iii) that the notice have effect in relation to a particular exporter or to exporters generally, as if different variable factors had been ascertained.

7.2.2 Variable Factors

The variable factors relevant to the determination of dumping duties payable under the Dumping Duty Act are export price, normal value and the NIP.

- **Export price** is determined under section 269TAB. Section 269TAB(1)(a) provides that the export price of any goods exported to Australia is the price paid or payable for the goods by the importer where the goods have been exported to Australia otherwise than by the importer, and have been purchased by the importer from the exporter in arms length transactions.

  Section 269TAB(1)(b) provides that the export price of goods is the price that the importer sold the goods, less the prescribed deductions, where:

  - goods have been exported to Australia otherwise than by the importer, and
  - were purchased by the importer from the exporter, but not at 'arm's length', and
  - the importer subsequently sells the goods in the condition they were imported to a party not associated with the importer.

  Section 269TAB(1)(c) provides that in all other cases, the export price is a price determined by the Minister having regard to all the circumstances of the exportation.

Section 269TAB(3) provides that, where the export price cannot be established under the preceding sections, the export price is determined having regard to all relevant information.

- **Normal value** is determined under section 269TAC. Section 269TAC(1) states that the normal value of any goods exported to Australia is the price paid or payable for like goods sold in the ordinary course of trade (OCOT) for home consumption in the country of export in sales that are arms length transactions by the exporter, or, if like goods are not so sold by the exporter, by other sellers of like goods.

  Section 269TAC(6) provides that the Minister may determine normal value having regard to all relevant information, provided he/she is satisfied that sufficient information has not been furnished or is not available to enable the normal value of goods to be ascertained under preceding sections.

- The **NIP** is defined in section 269TACA as the minimum price necessary to prevent the injury or a recurrence of the injury caused by the dumping.

- **Dumping margins** are worked out under section 269TACB.

- **Uncooperative exporters:** Section 269TACAB(1) sets out the provisions for calculating export prices and normal values for uncooperative exporters. Export prices are to be worked out under section 269TAB(3) and normal values are to be calculated under section 269TAC(6).

7.2.3 Uncooperative exporters

Section 269T(1) provides that an exporter is an 'uncooperative exporter' where the Commissioner is satisfied that an exporter of the goods the subject of the inquiry:

- did not give the Commissioner information considered to be relevant to the continuation inquiry within a period of time considered to be reasonable, or
- significantly impeded the inquiry.

The *Customs (Extensions of Time and Non-cooperation) Direction 2015* (the Direction) states at section 8 that the Commissioner must determine an exporter to be an uncooperative exporter on the basis that no relevant information was provided in a reasonable period if that exporter fails to provide a response or fails to request a longer period to do so within a specified timeframe.

As noted in section 2.4.1, the commission did not identify any exporters of the goods from China in the ABF import database during the inquiry period. The commission placed a copy of the exporter questionnaire on the EPR for any interested exporters to complete. The commission also sent a questionnaire to the GOC and advised of the initiation of this inquiry. The commission did not receive any responses to the exporter questionnaire or from the GOC.

Having regard to the Direction, the Commissioner has determined that all exporters of RIC from China are uncooperative exporters under section 269T(1) for the purpose of this inquiry. This is because no exporters from China provided relevant information to the commission within a reasonable period of time.

Based on this finding, and in accordance with section 269TACAB(1), which sets out the provisions for calculating export prices and normal values for uncooperative exporters, the commission has calculated:

- the export price for the uncooperative exporters under section 269TAB(3), having regard to all relevant information (as per section 269TACAB(1)(d))
- the normal value for the uncooperative exporters under section 269TAC(6), having regard to all relevant information (as per section 269TACAB(1)(e)).

7.3 Variable factors

As the Commissioner has decided to recommend that the Minister takes steps to secure the continuation of the measures, the commission has considered whether the variable factors relevant to the determination of duty payable under the Dumping Duty Act have changed such that the notice should be altered.

The variable factors relevant to the determination of duty payable under the Dumping Duty Act were last ascertained by the Minister on 23 December 2020 following *Review 564* (REV 564).[86]

In its application, InfraBuild submitted that the export price has increased by 6% and that normal value has increased by 9%.[87]

The commission assessed whether the export price and normal value relevant to the determination of duty payable on the goods have changed. The following sections outline the assessment of the relevant information available.

7.3.1 Export price

The commission has determined the export price for uncooperative exporters using third-party financial data for wire rod prices from China.[88]

The export price for uncooperative exporters from China was determined having regard to all relevant information under section 269TAB(3). The relevant information before the commission includes:

- uncooperative exporter export prices from the original investigation
- information provided in the application
- wire rod prices from third-party providers.

[86] EPR 564, no 9 (ADN 2020/141).

[87] EPR 675, no 1, Non-confidential attachment – Annexure A – Reasons for Continuation of anti-dumping measures applying to rod in coil from China (Section 1.2.1.5).

[88] The commission has used wire rod FOB prices from China sourced from Bloomberg LP.

Third-party financial data for wire rod prices

The commission has calculated an export price for uncooperative exporters by reference to independent third-party financial data obtained for similar goods (wire rod) exported from China on FOB terms.

The commission also considered the information relating to export prices provided by InfraBuild in its application. That information was also based on third-party pricing data for wire rod. The commission found that the prices obtained by InfraBuild were similar to those obtained by the commission, although they were from different sources.

Therefore, the commission has analysed FOB export prices for steel wire rod (commercially considered the most similar to RIC) exported from China, as published by Bloomberg, and considers this to be independent and reliable pricing data that fairly represents prevailing market conditions during the current inquiry period for the goods.

The commission considers that wire rod is appropriate as it is a form of hot-rolled steel rod in coil form. The commission used information relating to wire rod of a diameter of less than 14 mm, which aligns with the goods description.

The commission's export price calculation for uncooperative exporters is set out in **Confidential Attachment 5.**

Uncooperative exporter export price from the original investigation

The commission's approach in previous cases involving RIC from China has been to apply a timing adjustment to the uncooperative export price determined in the original investigation. This timing adjustment was based on the movement of FOB export prices for RIC from China using third-party information.

The commission considers that there are several factors that mean it is not appropriate to apply a further timing adjustment to the uncooperative export price from the original investigation. This includes:

- the length of time between the original investigation and this inquiry (almost 10 years)
- the lack of exports of RIC from China since the original investigation
- structural changes to the Chinese steel industry since the original investigation.

Accordingly, the commission considers that the third-party RIC pricing provides a more accurate reflection of the export price during the inquiry period.

7.3.2 Normal value

The commission has determined the normal value for uncooperative exporters using:

- data provided by InfraBuild Steel for the cost of production for hot-rolled reinforcing long products in China, with steel billet costs adjusted as per section 7.3.3
- verified SG&A for Baowu Group Echeng Iron and Steel Co., Ltd (Echeng) as part of CON 669
- verified OCOT profit for Echeng as part of CON 669
- adjustments based on verified data from CIR 643.

Pursuant to section 269TACAB(1), the commission has determined the normal value for uncooperative exporters under section 269TAC(6) – having regard to all relevant information. The relevant information before the commission includes:

- information provided by InfraBuild in the application
- verified information from other related cases
- normal values for cooperating exporters from *Review 413* and *414*.

Information provided by InfraBuild Steel and from related cases

The commission considers that information provided by InfraBuild in the application, along with information from related cases, is the best available information to determine the normal value.

In the application, InfraBuild provided a proprietary cost benchmarking index for Chinese producers of hot rolled reinforcing long products. The commission examined this information and considered that it is suitable to use as a basis for the cost of production for RIC in China. This is because:

- the data covers the whole of the inquiry period
- the data provides a cost breakdown of various items, including the cost of production for steel billet
- the hot rolled reinforcing long product is similar to the goods, being wire rod.

The commission considers that the input costs of steel billet in China are not suitable to use to construct a normal value for uncooperative exporters under section 269TAC(6). The commission has adjusted the steel billet cost information provided by InfraBuild Steel with reference to verified cost of production for steel billet from Hoa Phat Hai Duong Steel Joint Stock Company (Hoa Phat), an exporter of rebar from Vietnam. The commission's assessment of the domestic market for RIC and steel billet in China is outlined in section 7.3.3.

To ensure that these costs are comparable to FOB export prices, the commission has added on SG&A, an amount for profit, and domestic inland transport.

The commission has used verified SG&A and profit from Echeng as part of CON 669.[89] The period examined in CON 669 is the same as the inquiry period. The commission considers that rebar, specifically rebar in coil form, shares similarities with RIC. These include:

- they are both produced using a hot rolled process from steel billet
- outside of deformations, they can have similar dimensions and sizes
- they have similar yield strengths
- they are used for similar end uses (concrete reinforcement).

[89] EPR 669, no 8.

The commission has used Echeng's SG&A applicable to rebar in coil, in a similar yield strength to those typical to RIC (between 300 MPa and 480 MPa). The commission has used Echeng's overall OCOT profit as it was calculated in relation to all of Echeng's domestic sales of rebar.

To compare the normal value on FOB terms, the commission has also added an adjustment for domestic inland freight. The commission has used the verified domestic transport expenses for Beijing Xingtai Steel Mesh & Technology Development Co., Ltd (Xingtai) as part of CIR 643.[90] These domestic transport expenses relate to Xingtai's purchases of RIC at delivered terms. The commission considers that this is the best available information relating to domestic transport costs for RIC in China.

The commission's normal value calculation for uncooperative exporters is set out in **Confidential Attachment 6**.

Normal values from Review 413 and 414

The commission examined whether using the same approach as REV 564 is appropriate. In REV 564, the commission applied a timing adjustment to the uncooperative normal values from *Review 468*. In *Review 468*, the commission adjusted the normal values found in *Review 413* and *414* based on movements in Latin American FOB prices for steel billet.[91] This approach was on the basis that there was no other relevant information to determine the normal value.

In *Review 413* and *414*, the commission constructed normal values for the cooperating exporters under section 269TAC(2)(c). As part of that construction, the commission used a benchmark based on the verified costs of steel billet manufacturers in Indonesia, Spain, and Taiwan to replace the cooperating exporters' cost of steel billet.[92]

As outlined in section 7.3.3, the commission considers that neither the benchmark used in *Review 413 and 414* for steel billet, nor the Latin American FOB prices for steel billet used in REV 564 are the best available information in this inquiry in relation to the cost of production of steel billet in China. Accordingly, the commission does not consider that it is appropriate to use the same method of determining the normal value as in REV 564.

7.3.3 Particular market situation

The commission has previously found that a PMS exists in the domestic market for RIC in China.[93]

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[90] EPR 643, no 22.

[91] EPR 564, no 8, *Anti-Dumping Commission Report no 564*, section 4.2.2.1.

[92] EPR 413, no 17, *Anti-Dumping Commission Report no 413*, section 4.5.1.

[93] *Anti-Dumping Commission Report No 301* (EPR 301), *Anti-Dumping Commission Report No 413* (EPR 413) *and 414* (EPR 414), *Anti-Dumping Commission Report No 468* (EPR 468), and *Anti-Dumping Commission Report No 564* (EPR 564).

Although the current continuation application did not include any allegations of a PMS, the commission issued a questionnaire to the GOC at initiation. The purpose of that questionnaire was to seek information relevant to the domestic market for RIC in China. The GOC was informed that if it did not respond, the commission may be required to rely on information supplied by other parties, previous findings, and any other information the Commissioner considers relevant. The GOC did not provide a response to the questionnaire.

Subsequently, InfraBuild Steel lodged a submission on 18 November 2025 alleging that a PMS continued to exist through the inquiry period, rendering domestic sales unsuitable for determining a normal value under section 269TAC(1).[94]

The commission notes that it is unable to determine a normal value under section 269TAC(1), regardless of whether a PMS is found to still exist, on the basis that all exporters from China are uncooperative exporters.[95] In this circumstance, section 269TACAB(1)(e) requires the normal value to be determined under section 269TAC(6) having regard to all relevant information.

Despite there being no express requirement to examine whether a PMS exists in section 269TAC(6), the commission had regard to InfraBuild Steel's evidence regarding PMS, and information from past cases to the extent that the information was relevant to determining the normal value under section 269TAC(6).

The commission considers that evidence available regarding PMS was relevant to assessing the inputs into its normal value calculation under section 269TAC(6) and has addressed this below.

In particular, the commission considers that the influence of the GOC over the steel industry in China has distorted steel billet costs in China such that input costs for steel billet in China are not suitable to use without adjustment in constructing a normal value for uncooperative exporters under section 269TAC(6).

A detailed analysis is below.

Summary of previous PMS findings by the commission

In the original investigation, the Commissioner found that there was a PMS in China such that domestic selling prices for steel RIC were not suitable for determining normal values under section 269TAC(1).[96] In particular, the Commissioner found that the Chinese steel market was heavily shaped by state intervention through:

- subsidies
- preferential financing
- tax incentives
- oversight and directives

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[94] EPR 675, no 7.

[95] As per section 269T(1).

[96] Pursuant to section 269TAC(2)(a)(ii).

- a significant number of state-owned steel companies in operation.

The combination of these factors influenced production and capacity decisions of RIC manufacturers in China. The resulting impact was a chronic oversupply that depressed domestic prices below market competitive levels. As those prices did not reflect normal market forces, the Commissioner concluded that Chinese domestic prices were unreliable for determining normal values.

The commission therefore constructed normal values in accordance with section 269TAC(2)(c) and sections 43, 44 and 45 of the *Customs (International Obligations) Regulation* 2015 (the Regulation). A key finding of the original investigation was that the above-mentioned GOC-driven market distortions resulted in depressed raw material prices, particularly for steel billet (found to represent 80% to 85% of the cost of production for RIC in China).

Subsequent reviews and continuation inquiries confirmed the ongoing GOC influence in China's domestic steel market, which continued to distort competitive market conditions, rendering exporter's (uncooperative or otherwise) actual domestic selling prices unsuitable for establishing normal values.

The most recent PMS assessment, outlined in REV 564 and relating to the review period 1 July 2019 to 30 June 2020, found such interventions continued to be exerted through multiple mechanisms, including:[97]

- government oversight and directives – significant GOC influence in the steel industry, including ownership of major producers (state-owned enterprises (SOEs)) and policy directives
- interventions affecting raw material costs – evidence of government intervention in the form of export taxes, export quotas and restricted VAT rebates on iron ore and scrap markets for example, distorting cost structures
- financial support – provided through access to preferential loans and subsidies for steel producers, which has the effect of artificially reducing operating costs and inflating profitability, both of which encourages supply expansion and delays unprofitable producers from exiting the industry
- overcapacity and price suppression – structural overcapacity in China's steel sector leading to artificially low domestic prices, despite attempts by the GOC to address these imbalances.

When considering raw material costs, the commission considered evidence that identified where Chinese government direction and policies had significantly impacted the cost structure of raw materials used in steel RIC production. These included:[98]

- export duties on raw materials used in steel making - duties on chromium, crude steel, iron ore, coking coal, manganese, molybdenum, pig iron and steel scrap artificially increase costs for exporters and influence domestic pricing

[97] EPR 564, no 8, Appendix A.

[98] EPR 564, no 8, Appendix A.

- macroeconomic policies and national plans - the GOCs overarching industrial strategies, such as the National Steel Policy, integrate chromium mines into the steel sector, creating systemic cost distortions
- GOC control over exportation of raw materials - non-automatic export licencing requirements for certain raw materials add transaction costs and reduces flexibility for exporters, limiting their ability to respond to sales opportunities
- strategic mineral classification - the GOC's designation of chromium as a 'strategic mineral' subjected it to government macro-control and decision-making, and was found to have distorted market-driven pricing of raw materials
- tariffs and quotas - although tariffs and quotas on coke and coking coal have been reduced, they remain in place for scrap steel, iron ore and coking coal, resulting in raw material market distortions continuing.

Based on these factors the commission determined that a particular market situation continued to exist in China's domestic market for RIC due to the GOC continuing to exert influence on the Chinese steel industry and distorting competitive market conditions. The commission again adopted in REV 564 the Latin American steel billet export price at the FOB level (as published by Platts) as an independent and reliable benchmark for competitive market costs.

Summary of information in InfraBuild Steel's submission

InfraBuild's application did not include claims of a PMS in China, however, it lodged a submission dated 18 November 2025 to this effect.[99] InfraBuild Steel submitted that the previous findings of a PMS in China for RIC continued to exist in the current inquiry period.

InfraBuild submitted that as raw material prices, production levels, and industry structure are all policy-determined, domestic RIC prices in China do not reflect ordinary competitive market conditions. Therefore, domestic prices cannot be used to establish normal values under section 269TAC(1). InfraBuild Steel's submission emphasises consistency with prior commission findings that a PMS exists for RIC in China, and that this situation continues in the current inquiry period.

To evidence the continued existence of a PMS in the domestic market for RIC in China, InfraBuild referenced the following factors.[100]

GOC capacity reduction policies

InfraBuild submitted that the GOC's capacity reduction policies are evidence of the extent of the GOC's involvement and influence over the broader steel industry in China.

[99] EPR 675, no 7, Submission on assessment of Chinese RIC market.

[100] EPR 675, no 7, Annexure – China market assessment.

InfraBuild referenced reforms the GOC has introduced to address overcapacity, such as the *Opinions of the State Council on resolving excess production capacity and achieving development out of difficulties in the steel industry (2016)*. That policy aimed to reduce 100-150 million tonnes (mmt) of steel capacity by 2020. The central government pledged CNY100 billion for compensation and plant closures and prohibited new capacity registration. However, the *OECD Steel Outlook 2025* report notes that China has only reduced capacity by 6.7 mmt since 2019, while demand fell by an estimated 41 mmt. InfraBuild Steel submits this mismatch reflects the policies have not led to the exit of loss-making firms (including 'zombie mills', mills which continue to operate despite being financially unviable), and structural over-capacity is still present.

InfraBuild also submitted that overcapacity extends to coal production due to incentives for coal-based cities to develop coal mining and production.

Industry planning guidelines and directives

InfraBuild submitted that decisions about levels of production in the Chinese steel market are often based on GOC policy goals as opposed to properly functioning price signals. This includes macroeconomic strategies and industrial policies that shape pricing and production decisions, rather than market-driven price signals.

InfraBuild referenced a number of GOC planning guidance and directives that the commission had previously identified as part of *Continuation Inquiry 632*.

InfraBuild submitted that this guidance and directives are enforced by the GOC through:

- the presence and role of SOEs
- the role of the National Development and Reform Commission (NDRC)
- explicit enforcement mechanisms.

Role and operation of SOEs in Chinese steel markets

InfraBuild submitted that the role of SOEs provides a buffer to the Chinese steel industry from external market forces. SOEs operating in upstream sectors provide inputs to steel companies at below market prices and on preferable terms. This is relevant to the RIC market in China, as the major input into RIC is steel billet.

InfraBuild provided data from the World Steel Association to illustrate that SOEs contributed to over 70% of the production of the largest 10 Chinese steel firms by production.

InfraBuild referenced OECD and World Bank findings that indicate China's steel industry receives subsidisation that is five times higher than the average for partner economies, with SOEs receiving even more subsidisation than private firms. This subsidisation increased with the level of state ownership.

InfraBuild submitted that SOEs benefit disproportionately to privately owned steel firms through preferential access to below-market financing, inputs and business opportunities, as well as protection from competition. The combined effect means that SOEs are more likely to adhere to the GOC plans and directives, as well as continue to operate on non-commercial terms, further contributing to oversupply and distorted pricing. Such distortion extends to both upstream (including raw materials) and downstream steel product pricing.

Direct and indirect financial support

InfraBuild submitted that financial support enables loss-making firms to continue selling steel products (including upstream steel inputs) into the domestic Chinese market at rates that do not correspond to the cost of production for those products in China.

InfraBuild referenced OECD findings that China's steel subsidisation rate (as a percentage of firm revenues) is five times higher than the average for other non-OECD economies, which in turn is double that of OECD countries.

The impact of subsidies on crude steelmaking capacity

InfraBuild referred to the OECD report on *the Drivers and Impacts of Subsidies to Steel Firms*. That report found substantial levels of subsidisation provided to Chinese steel firms, primarily in the form of grants and below-market borrowings (BMB).

Taxation arrangements

InfraBuild submitted that taxation arrangements keep input prices artificially low and create significant incentives for exporters to redirect these products into the domestic market. This in turn increases domestic supply and reducing domestic prices to a level below what would have prevailed under normal competitive market conditions.

Competition in Chinese steel markets

InfraBuild submitted that the GOC has significantly affected the dynamics and price setting in the domestic market, including limited foreign competition.

The GOC role in the market for the goods

InfraBuild submitted that the GOC continues to exert significant influence over RIC manufacturers.

InfraBuild referenced the 2024 financial report of Hunan Valin Steel Co., Ltd, the parent company of a producer of RIC in China. The financial report indicates that Hunan Valin Steel Co., Ltd received government grants. These grants helped to offset a drop in Hunan Valin Steel Co., Ltd's net profit in 2024.

Significance of steel billet costs in the production of RIC and the goods

InfraBuild submitted that the influence of the GOC has distorted China's steel and raw material markets, driving down domestic prices. To support its claim, InfraBuild Steel provided a comparative analysis of domestic selling prices for RIC sold in China against domestic prices in Japan, the Republic of Korea (Korea), and Taiwan for the period June 2021 to May 2025. The data demonstrated that Chinese domestic prices for RIC were consistently lower than those in the highlighted regional markets throughout the four-year period.

InfraBuild claimed that China's consistently lower domestic selling prices for RIC reflect the effect of market influence of billet pricing on overall production costs and final RIC prices. This is because steel billet represents the majority of the cost of production for RIC.[101]

The commission's assessment

The commission considers that the influence of the GOC over the steel industry in China has distorted steel billet costs in China such that Chinese steel billet cost data is not reliable for determining a normal value under section 269TAC(6).[102]

The following findings and conclusions are made in the absence of questionnaire responses from the GOC or any Chinese exporters. The commission sought a variety of information and evidence from the GOC, including information on the Chinese RIC steel industry and market generally, including relevant SOEs, as well as details of preferential policies, which may or may not be affecting these sectors. The GOC did not cooperate with this request for information.

The lack of cooperation from both the GOC and exporters limits the evidence available to the commission. This constrains the commission's ability to verify whether raw material prices in China are market driven when ascertaining a normal value in accordance with section 269TAC(6). In the absence of information from the GOC and exporters of RIC, the commission has had regard to various key sources, including findings in other relevant cases and InfraBuild's submission, in order to assess GOC influence on raw material prices and costs in China.

[101] InfraBuild Steel provided the proportion of its cost of production for RIC that was represented by steel billet as part of its confidential submission.

[102] The commission notes that in SEF 675, the commission made a finding on the situation in the market for RIC in China. The commission considers this is not necessary when calculating normal value under section 269TAC(6).

Relevance of steel billet costs to overall cost of production

The commission considers that, in line with InfraBuild Steel's submission, steel billet represents the majority of the cost of production for RIC in China. The commission has previously found that steel billet represented 80% to 85% of the cost of production for RIC in the original investigation.[103] Confidential information provided by InfraBuild Steel in its application confirms that steel billet comprises a significant proportion of the overall cost of production for RIC in the inquiry period.[104] The commission considers that any distortions to the cost of steel billet will therefore have a material impact on the cost of production for RIC in China.

The commission also previously found that the manufacturers of RIC in China were primarily fully integrated, meaning they produced their own steel billet.[105] The commission considers that it is appropriate to examine the effects of the GOC's influence over the market for the raw materials used to produce steel billet in addition the influence over the steel industry more broadly.

Distortions to Chinese steel billet costs

The commission considers the GOC's involvement and influence over the steel industry to be a primary cause of the prevailing structural imbalances within both the RIC market and the broader steel industry. The GOC's historic and continued involvement in the Chinese steel industry, through its policies, planning guidelines, plans and directives materially contributed to its steel industry's overcapacity, over supply and distorted structure during the inquiry period.

Noting the limited information available due to the lack of cooperation, the commission considers that the information before it is indicative of the conditions observed in prior cases as still occurring in the current inquiry period.

The conditions created by the GOC significantly affected the dynamics and price setting in Chinese domestic steel markets. These effects include distortions to the raw material markets specific to the production of steel. This involvement has resulted in the costs of those materials being different than what would have prevailed in the absence of GOC involvement and influence. The commission has identified the following factors which have resulted in a distortion to the markets for the raw materials used in the production of steel billet.

The GOC established the China Mineral Resources Group (CMRG) in 2022 as a SOE to centralise iron ore procurement and increase control over iron ore pricing.[106] This measure increases the GOC's control over iron ore pricing in China and allows tolerance for losses due to state backing, collectively distorting iron ore prices in China.

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[103] EPR 301, no 38, *Anti-Dumping Commission Report No 301* section 5.4.

[104] EPR 675, no 1, Confidential Attachment 1.2.1. The confidential attachment provides information on Chinese manufacturer's cost of production for wire rod.

[105] EPR 301, no's 25 and 28.

[106] China Minerals, www.cmr-co.com, China Minerals website (Google translate), n.d., accessed 15 October 2025.

As identified by InfraBuild in its submission[107], there is overcapacity in the coal market in China. The European Commission has found that SOEs represent 88% of assets in the mining and washing of coal industry.[108] InfraBuild also submitted that SOEs receive more support from the GOC, and are more likely to implement the GOC's plans and targets. The commission considers this has the effect of perpetuating the situation of overcapacity in the coal market. The commission considers that the influence of the GOC over the coal market in China has led to oversupply and reduced coal prices, lowering steel making costs.[109]

The GOC also maintains high export duties on steel scrap (40%) and pig iron (20%), discouraging exports and increasing domestic supply, which reduces raw material prices and lowers steel production costs.[110]

Electricity is regulated under the *Pricing Law of the People's Republic of China*, and the GOC maintains control over pricing through mechanisms such as coal-electricity price linkage, resulting in electricity prices that differ to prices that would prevail in the absence of such control.[111]

Finally, the commission considers that the support afforded SOEs contributes to excess capacity and depresses prices for raw materials as SOEs can absorb losses and maintain demand for inputs, creating material distortions in input pricing. As identified by InfraBuild, SOEs receive a disproportionate amount of support from the GOC. The commission has also found this to be the case in CON 632.[112]

Based on the information available, the commission considers that the Chinese market for RIC continues to be affected by GOC influence.

Adjustment to steel billet costs for determining normal value under section 269TAC(6)

The commission has used the verified cost of production for steel billet from Hoa Phat Hai Duong Steel Joint Stock Company (Hoa Phat), an exporter of steel reinforcing bar (rebar) from Vietnam, as the basis of an adjustment to the Chinese steel billet cost data in InfraBuild's application.

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[107] EPR 675, no. 7.

[108] European Commission (EC), 'Commission staff working document on significant distortions in the economy of the People's Republic of China for the purposes of trade defence investigations', document no SWD(2024)91 final (EC report 2024), EC, European Union Government, 10 April 2024, p 354.

[109] H Yermolenko, 'Coking coal prices in China fall amid oversupply', *GMK Centre,* 29 May 2025, accessed 16 June 2025.

[110] Ministry of Finance of the People's Republic of China (MOFC), *Announcement of the State Council Tariff Commission on the Tariff Adjustment Plan for 2025*, MOFC website (Google translate), 2025, accessed 25 June 2025, Attachment 3: Export Tariff Rate Table.

[111] NDRC, 'Guiding Opinions of the National Development and Reform Commission on Deepening the Reform of the On-grid Tariff Formation Mechanism for Coal-fired Power Generation', NDRC website (Google translate), 21 October 2019, accessed 3 November 2025.

[112] EPR 632, no 35, *Anti-Dumping Commission Report No 632*, Appendix C, section C4.4.

The commission considers that the above identified distortions mean that steel billet costs in China would not be appropriate for establishing a constructed normal value for RIC. Accordingly, the commission considers that it is appropriate to adjust the cost of production for steel billet in China to account for the GOC influence. The commission considers that a cost for steel billet should be based on a cost that is absent any GOC distortion or influence on the steel market and steel industry in China.

The commission considered using a steel billet cost based on prices of steel billet sold in China. However, as noted previously, due to the lack of cooperation from the GOC and Chinese exporters there was no information provided to enable this analysis. Further, the commission considers that the GOC's numerous influences on the Chinese steel industry has materially distorted the costs for steel billet and steel markets generally, and therefore distorted Chinese prices of steel billet. The commission further examined whether import prices of steel billet into China could be used. However, absent information concerning import volume penetration into the Chinese market and contract shipping terms, the commission is unable to adequately assess whether any import prices would reflect a cost for steel billet absent the GOC's distortions or influence.

The commission has verified cost of production information for Hoa Phat as part of *Investigation 655 – Steel reinforcing bar* (INV 655). Although INV 655 examined steel reinforcing bar (rebar), the commission considers the cost of production information for Hoa Phat is still relevant because:

- rebar is primarily made from the same raw material as RIC, steel billet
- Hoa Phat is an integrated producer that uses a blast furnace to produce steel, which is the main form of steel production in China
- the commission found that Hoa Phat's production records reasonably reflected competitive market costs.[113]

The commission considers using Hoa Phat's cost of production for steel billet prices is appropriate as integrated manufacturers of the raw material in China would be required to manufacture the goods in a similar manner, incurring similar costs of production.

The commission has adjusted Hoa Phat's cost of production for steel billet for the differences in labour costs between China and Vietnam.

The commission considers Hoa Phat's steel billet cost data to be more appropriate than the benchmarks used in previous cases:

- A composite benchmark using steel billet costs in Indonesia, Spain, and Taiwan in REV 413/414
- Latin American FOB prices for steel billet used previously in REV 564.

This is because those costs/prices would:

- in respect of both benchmarks, require adjustments to reflect a cost of production in China
- in respect of Latin American FOB prices, reflect a selling price for steel billet, rather than the manufacturer's cost of production

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[113] EPR 655, No 53.

- in respect of Latin American FOB prices, would require adjustments for expenses such as profit and SG&A that the commission does not have access to.

7.3.4 Dumping margin

The commission has calculated a dumping margin for all exporters of RIC from China to Australia by comparing the adjusted normal value with the export price. The resultant dumping margin is **13.9%**.

The commission's dumping margin calculation for uncooperative exporters is set out in **Confidential Attachment 7**.

7.3.5 Australian industry submission in response to SEF 675

In its submission dated 12 January 2026, InfraBuild Steel expressed support for the commission's preliminary recommendations and finding in SEF 675 that the measures continue to apply as if different variable factors have been ascertained. InfraBuild Steel further confirmed its support of the commission's findings concerning the distortion of steel billet costs in China.[114]

[114] EPR 675, no 9

8 VARIABLE FACTORS – NON-INJURIOUS PRICE

8.1 Finding

Having regard to the available information, the commission has determined that the NIP has changed for uncooperative exporters from China.

The commission calculated that the NIP is higher than the normal value established for uncooperative exporters from China. Accordingly, the NIP is not operative.

The commission's calculation of the NIP is set out in **Confidential Attachment 8**.

8.2 Legislated Framework

8.2.1 The NIP

The NIP is defined in section 269TACA as the minimum price necessary to prevent the injury or a recurrence of the injury caused by the dumping. The NIP is a variable factor relevant to determining duty payable under the Dumping Duty Act.

Where the Minister is required to determine the IDD payable, section 8(5B) of the Dumping Duty Act applies. Under section 8(5B) of the Dumping Duty Act, where the NIP of the goods is less than the normal value of the goods, the Minister must have regard to the desirability of specifying a method such that the sum of the export price and the IDD payable does not exceed the NIP ('lesser duty rule'). However, under section 8(5BAA) of the Dumping Duty Act, the Minister is not required to have regard to the lesser duty rule if:

- the normal value of the goods was not ascertained under section 269TAC(1) because of the operation of section 269TAC(2)(a)(ii), or
- there is an Australian industry in respect of like goods that consists of at least 2 small-medium enterprises, whether or not that industry consists of other enterprises.

Where any of the above exceptions apply, the Minister's consideration of the lesser duty rule is not mandatory, but the Minister may still wish to exercise their discretion to do so.

The legislation does not prescribe a calculation method for the NIP. The commission generally derives the NIP by first establishing an unsuppressed selling price (USP), being a price at which the Australian industry might reasonably sell its product in a market unaffected by dumping. The commission will then deduct the costs incurred in getting the goods from the export FOB point (or another point if appropriate) to the relevant level of trade in Australia from the USP. The deductions normally include overseas freight, insurance, into store costs and amounts for importer expenses and profit.

8.2.2 The unsuppressed selling price

The Manual provides a hierarchy of options for establishing a USP:[115]

- the Australian industry's price or market approach in a period unaffected by dumping
- the constructed approach, using the Australian industry's CTMS data and a reasonable amount for profit
- the price or market approach for undumped imports.

8.3 Commission's approach and findings

The commission has calculated the NIP and found that it is higher than the normal value for uncooperative exporters.

The commission calculated the NIP by deducting post-exportation costs from the USP. The USP was calculated using InfraBuild Steel's selling prices during the inquiry period.

8.3.1 Approach in the original investigation

In the original investigation, the Commissioner did not recommend that the Minister have regard to the lesser duty rule. This was because normal values were not ascertained under section 269TAC(1) because of the operation of section 269TAC(2)(a)(ii).

In the most recent review, REV 564, the commission determined the USP as being the same as InfraBuild Steel's selling prices during the relevant period. This was because there were no exports from China during the relevant period. Accordingly, the commission considered that InfraBuild Steel's prices were unaffected by dumping. The commission then deducted post-exportation expenses from the USP to determine the NIP.

8.3.2 Commissioner's assessment of NIP and USP

The commission has used the same approach as REV 564 to determine the NIP, by deducting post-exportation costs from InfraBuild Steel's weighted average selling price during the inquiry period.

The commission has found that there were no exports from China during the inquiry period. Accordingly, the commission considers that InfraBuild Steel's prices reflect a period unaffected by dumping. The commission considers that this is reflective of the minimum price necessary to prevent injury to an Australian industry caused by dumping.

Using InfraBuild Steel's actual selling prices as the basis for the USP, the commission then deducted the following post-exportation costs:

- ocean freight and marine insurance expenses
- other importation costs (port, unpacking, container charges, etc.)
- importer selling expenses.

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[115] The Manual, pp 106–109.

The ocean freight and marine insurance expenses were determined using ABF import data for imports of rebar from China over the inquiry period. Information for the remaining costs was obtained from verified importer data relied on in Continuation Inquiry 660 (CON 660). The relevant period for CON 660 partially overlaps the inquiry period. The commission notes that importer profit was not deducted to calculate the NIP in CON 660 because the commission found either the importer not to be profitable during the period in respect of its sales of rebar or the profit was not relevant to the goods.

As outlined in section 7.3.2, the commission considers that rebar has similar characteristics to RIC such that certain expenses for rebar are suitable to use for RIC in the absence of other information.

InfraBuild Steel's submission regarding the Chinese market for RIC

In its submission of 18 November 2025, InfraBuild Steel submitted that the Minister was not required to have regard to the lesser duty rule due to the existence of a PMS in the domestic market for RIC in China.[116]

Section 8(5BAA) of the Dumping Duty Act states that the Minister is not required to have regard to the lesser duty rule if the normal value was not ascertained under section 269TAC(1) due to the operation of section 269TAC(2)(a)(ii). Section 269TAC(2)(a)(ii) relates to a finding of a PMS such that domestic sales cannot be used as the basis of the normal value under section 269TAC(1).

As the commission has determined normal values for uncooperative exporters under section 269TAC(6), the Minister is still required to have regard to the lesser duty rule under section 8(5B) of the Dumping Duty Act. However, as outlined in this section, the commission has found that the NIP is higher than the normal value, thus the lesser duty rule does not apply.

8.3.3 Application of the lesser duty rule

The commission has found that the lesser duty rule does not apply. The commission compared the NIP to the normal value for uncooperative exporters and found that the NIP was higher.

[116] EPR 675, no 7.

9 DUTY METHOD

9.1 Findings and recommendations

The Commissioner considers the IDD payable on the goods exported from China should be worked out using the *combination* method, which is the same as the current method.

9.2 Legislative framework

The *Customs Tariff (Anti-Dumping) Regulation 2013* (Tariff Regulation) prescribes the methods available to the Minister for working out IDD payable. The methods are:

- fixed duty method ($X per tonne)
- floor price duty method
- combination duty method
- *ad valorem* duty method (i.e. a percentage of the export price).

The various forms of dumping duty all have the purpose of removing the injurious effects of dumping. However, in achieving this purpose, certain forms of duty will better suit particular circumstances than others. More detail on the nature and operation of the various forms of duty are contained in the *Guidelines on the Application of Forms of Dumping Duty November 2013* (the Guidelines).[117]

9.3 Recommended form of measures and effective rate of duty

Table 15 outlines the current and recommended duty methods and measures.

Country	Exporter	Duty method and IDD rate	
		Current	Recommended
China	All exporters	Combination (fixed 33.1%)	Combination (fixed 13.9%)

Table 15: Current and recommended duty methods and measures

The commission considers that the combination duty method remains the most appropriate duty method for uncooperative exporters. The commission recommends that:

- the fixed component is an *ad valorem* amount set to the dumping margin (13.9%)
- the variable component is a floor price set to the export price.

[117] Anti-dumping and countervailing system key legislation, directions and policy, *Guidelines on forms of dumping duty*.

The commission considers that the combination duty method is appropriate as it provides a degree of stability to export prices by ensuring that they do not fall below the floor price component. In addition, the commission's finding that steel billet costs were distorted in China during the inquiry period means that there is a potential for uncooperative exporters to lower export prices in order to avoid the intended effects of the duties. This would result in the diminishing effectiveness of the measures if an *ad valorem* only duty method was applied.

9.4 Australian industry submission in response to SEF 675

In its submission dated 12 January 2026, InfraBuild Steel expressed support for the commission's preliminary recommendations and findings in SEF 675 to continue applying the combination duty method to all Chinese exporters. InfraBuild Steel considered it the most effective means of addressing dumping, reducing the risk of circumvention by way of duty absorption and protecting the Australian industry.[118]

[118] EPR 675, no 9

10 FINDINGS AND RECOMMENDATIONS

10.1 Findings

In accordance with section 269ZHF(2), the Commissioner is satisfied that the expiration of the anti-dumping measures applicable to the goods exported to Australia from China would lead, or would be likely to lead, to a continuation of, or a recurrence of, the dumping and the material injury that the anti-dumping measure is intended to prevent.

The Commissioner finds that the measures should apply all exporters as if different variable factors had been ascertained. The Commissioner finds that the following rate of IDD should apply from 23 April 2026.

Country	Exporter	Fixed rate of IDD	Duty method
China	All exporters	13.9%	Combination

Table 16: Recommended measures resulting from this inquiry

The commission notes that the Minister is provided with a schedule to this report that outlines the Minister's relevant powers with respect to making a declaration, determinations and being satisfied as to certain findings of fact, consistent with the below.

10.2 Recommendations to the Minister

The Commissioner recommends that the Minister take steps to secure the continuation of the dumping duty notice and, pursuant to section 269ZHF(1)(a)(iii), that the dumping duty notice have effect in relation to all exporters as if different variable factors had been ascertained.

The Commissioner recommends that the Minister **declare:**

- in accordance with section 269ZHG(1)(b) that he has decided to secure the continuation of the anti-dumping measures applying to the goods exported to Australia from China.

The Commissioner recommends that the Minister **determine:**

- that pursuant to section 269ZHG(4)(a)(iii), the notice continues in force after 22 April 2026, but after this day has effect as if different specified variable factors had been fixed in relation to all exporters generally;
- in accordance with section 269TAB(3), having regard to all relevant information, that the export price for uncooperative and all other exporters is as set out in section 7.3.1 and Confidential Attachment 5;
- In accordance with section 269TAC(6), having regard to all relevant information, that that the normal value for uncooperative and all other exporters is as set out in section 7.3.2 and Confidential Attachment 6;
- In accordance with section 8(5) and section 8(5BB) of the Dumping Duty Act, and the Tariff Regulation, that the interim dumping duty payable on the goods is an amount worked out in accordance with the *combination of fixed and variable duty method* prescribed in sections 5(2) and (3) of the Regulation.

The Commissioner recommends that the Minister **be satisfied that**:

- in accordance with section 269TAB(3), sufficient information is not available to enable the export price of the goods exported to Australia from China to be ascertained under the preceding subsections of section 269TAB;
- in accordance with section 269TAC(6), sufficient information is not available to enable the normal value of the goods exported to Australia from to be ascertained under the preceding subsections of section 269TAC.

11 ATTACHMENTS

Confidential Attachment 1	Australian market and economic condition
Confidential Attachment 2	Likelihood of recurrence analysis
Confidential Attachment 3	Price undercutting analysis
Confidential Attachment 4	InfraBuild Steel injury evidence
Confidential Attachment 5	Uncooperative exporters export price
Confidential Attachment 6	Uncooperative exporters normal value
Confidential Attachment 7	Uncooperative exporters dumping margin
Confidential Attachment 8	USP and NIP calculations