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commercial + international

11 March 2026

**Director  
Investigations Branch  
Anti-Dumping Commission  
GPO Box 2013  
Canberra  
Australian Capital Territory**

**By email**

Dear Director

**Intex Group International Pty Ltd  
Case 679 –non-SIE corporate status of Intex import supply chain**

The Chinese exporter that supplied our client Intex with its ceiling and wall systems componentry, **[CONFIDENTIAL TEXT DELETED – supplier information]** did not complete and lodge an Exporter Questionnaire within the legislated period.

On that basis it must be treated as:

- (a) an uncooperative exporter under *Customs Act 1901* Section 269T “Definitions” with the consequence, under Section 269TACAB “Dumping duty notice--export prices and normal values for different categories of exporters”, that the Chinese exporter’s export price is to be determined by the Commissioner having regard to all relevant information, and the further consequence, under Section 269TAC(6), that the Chinese exporter’s normal value is also to be determined by the Commission having regard to all relevant information; and
- (b) a non-cooperative exporter for the purposes of Section 269TAACA “Determination of countervailable subsidy of non-cooperation by relevant entities” with the consequence, in determining the amount of a countervailable subsidy in respect of particular goods, that the Commissioner may act on the basis of all the facts available to the Commissioner and may make such assumptions as the Commissioner considers reasonable.

It has been brought to our attention by our client that **[CONFIDENTIAL TEXT DELETED – supplier information]** acquires steel coils from a privately held galvanizing company, and that the galvanizing company acquires the steel coils from a privately held steel making company. The attached document prepared by the exporter concerned provides validation of the information presented in this submission concerning **[CONFIDENTIAL TEXT DELETED – supplier information]** material suppliers.

Intex’s full import supply chain can be summarised as follows

#	Company	SIE?	Company role
1	[CONFIDENTIAL TEXT DELETED – supply chain information]	No	Chinese trader involved with the exportation of Australian iron ore to China
2	[CONFIDENTIAL TEXT DELETED – supply chain information]	No	Chinese trader involved with the importation of Australian iron ore into China and its sale to the steelmaking company in #3 <ul style="list-style-type: none"> <li>• [CONFIDENTIAL TEXT DELETED – percentage] equity held by [CONFIDENTIAL TEXT DELETED – supply chain information]</li> </ul>
3	[CONFIDENTIAL TEXT DELETED – supply chain information]	No	Chinese steelmaker that produces hot-rolled steel coils <ul style="list-style-type: none"> <li>• Holds [CONFIDENTIAL TEXT DELETED – percentage] equity in trading company in #2</li> <li>• Holds [CONFIDENTIAL TEXT DELETED – percentage] equity in trading company in #4</li> </ul>
4	[CONFIDENTIAL TEXT DELETED – supply chain information]	No	Chinese trader involved with the sale of the hot-rolled steel coils in #3 to the galvanising company in #5 <ul style="list-style-type: none"> <li>• [CONFIDENTIAL TEXT DELETED – percentage] equity held by [CONFIDENTIAL TEXT DELETED – supply chain information]</li> </ul>
5	[CONFIDENTIAL TEXT DELETED – supply chain information]	No	Chinese galvanizing company that coats the hot rolled steel coils by galvanisation and sells them to the company in #6
6	[CONFIDENTIAL TEXT DELETED – supplier information]	No	Chinese pressed metal manufacturer that makes ceiling and wall systems componentry for exportation to the importer/distribution company in #7
7	Intex Group	No	Australian importer/distributor of ceiling and wall systems componentry imported from the company in #6

In order to obtain support and verification of the information concerned, in so far as it concerns the key manufacturing entities shown in items #3 and #5, we undertook internet inquiries using a publicly available and we believe well-regarded “AI” search engine, Perplexity AI.

1 Regarding [CONFIDENTIAL TEXT DELETED – supply chain information], Perplexity AI advises as follows:

[CONFIDENTIAL TEXT DELETED – supply chain information] is generally characterized as a privately controlled, [CONFIDENTIAL TEXT DELETED – supply chain information] rather than a State-invested or state-owned enterprise.

A RIETI working paper on Chinese state capitalism explicitly describes [CONFIDENTIAL TEXT DELETED – supply chain information] as a “family-controlled firm,” identifying its boss/founder as [CONFIDENTIAL TEXT DELETED – supply chain information].<sup>1</sup>

Chinese corporate information services (e.g. Tianyancha/Qixin) list the company as a limited liability company established in [CONFIDENTIAL TEXT DELETED – supply chain information] with natural-person founders and do not indicate direct state ownership as a shareholder, which is how they typically flag state-owned or state-invested enterprises.<sup>2</sup>

Public descriptions of the group portray it as a large integrated enterprise engaged in steel, logistics and related businesses, but do not classify it as a state-owned or state-holding enterprise, which is usually highlighted where applicable in Chinese corporate profiles.<sup>3</sup>

On that basis, it is best classified as a privately held, family-controlled enterprise, not a State-invested enterprise.<sup>4</sup>

- 2 Regarding [CONFIDENTIAL TEXT DELETED – supply chain information] Perplexity AI advises as follows:

[CONFIDENTIAL TEXT DELETED – supply chain information] appears to be a privately held enterprise rather than a state-invested enterprise.

The company describes itself as a professional manufacturer of [CONFIDENTIAL TEXT DELETED – product information] located in [CONFIDENTIAL TEXT DELETED – supply chain information], with stated total investment and registered capital, but gives no indication of state ownership, which Chinese firms normally highlight when they are state-owned or state-controlled.<sup>5</sup>

Public business directories and trade platforms list it as a manufacturing/trading company with individual managers/contact persons and do not identify any government or state-owned group as shareholder or parent.<sup>6</sup>

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<sup>1</sup> Tao, Zhigang, *Getting Back a Level Playing Field under State Capitalism: Evidence from Quake Donations by Privately-controlled Companies in China* (RIETI Special Seminar, Research Institute of Economy, Trade and Industry, 22 February 2019) <https://www.rieti.go.jp/en/events/19022201/pdf/paper.pdf>.

<sup>2</sup> [CONFIDENTIAL TEXT DELETED – supply chain information].

<sup>3</sup> [CONFIDENTIAL TEXT DELETED – supply chain information].

<sup>4</sup> Output from Perplexity AI to Daniel Moulis, 26 February 2026, response to the prompt [CONFIDENTIAL TEXT DELETED – supply chain information] a privately held entity or a State-invested enterprise. All footnotes provided by Perplexity AI.

<sup>5</sup> [CONFIDENTIAL TEXT DELETED – supply chain information].

<sup>6</sup> [CONFIDENTIAL TEXT DELETED – supply chain information].

*On the available information, it should be treated as a privately held company, not a state-invested enterprise.<sup>7</sup>*

We request that the Commissioner consider this information as “*relevant information*” and “*facts available*” for the purposes of making assumptions in determining any dumping margin and countervailable subsidy with respect to **[CONFIDENTIAL TEXT DELETED – supplier information]**.

We further request that this consideration take place prior to the provision of the draft Intex visit report to us for our client’s review. We note that there could be little or no prospect that the investigation would be delayed by reason of the provision of this information and its contemplation by the Commission because the legislated period for the Statement of Essential Facts ends on 17 June 2026, which is still 3.5 months away.

If the information in this email is not considered to be “*relevant information*” and “*facts available*”, or is thought to be “*unreasonable*”, we would appreciate being provided with the information that the Commission believes is superior to the information we have provided in this email.

Yours sincerely

**Daniel Moulis**  
Partner Director

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<sup>7</sup> Output from Perplexity AI to Daniel Moulis, 26 February 2026, response to the prompt **[CONFIDENTIAL TEXT DELETED – supply chain information]** *a privately held entity or a State-invested enterprise*. All footnotes provided by Perplexity AI.