

26 March 2026

The Director, Investigations 1
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2600

BY EMAIL:
investigations1@adcommission.gov.au

Dear Director,

Dumping Investigation No. 692 in relation to Certain welded steel mesh sheets exported to Australia from the People's Republic of China and Malaysia

AUSTRALIAN INDUSTRY RESPONSE TO EXPORTER QUESTIONNAIRE RESPONSES

InfraBuild (Newcastle) Pty Ltd (**InfraBuild**) refers to the responses to questionnaire of various exporters in this investigation and makes the following observations.

Tianjin Tiankang Metals, China (TKM)¹

InfraBuild submits that no disclosure of the MCCs (Model Control Codes) exported to Australia or sold domestically have been made. This is a significant deficiency in the exporter's response.²

The questionnaire requests respondents to *'Provide a list of MCCs of the goods exported to Australia'* and

¹ EPR 692/010

² EPR 692/010, p. 20.

'MCCs of like goods sold on the domestic market'. However, the exporter responded:

*'Please see **Attachment C-3** Internal product codes and MCC'.*

This response is insufficient and does not amount to the "list" requested by the questionnaire. As such the response does not meet the evidentiary standard prescribed by subsection 269ZJ(2)(a), namely that it *'contains sufficient detail to allow a reasonable understanding of the substance of the information'*. By doing so TKM has failed or refused *'to provide information relevant to the case'* within the meaning of section 8 of the *Customs (Extensions of Time and Non-cooperation) Direction 2015 (Ministerial Direction)*. In these circumstances the Commissioner may reasonably deem the exporter, an *'uncooperative exporter'* within the meaning of subsection 269T(1), and treat TKM as such under section 269TACAB for the purpose of determining its export prices and normal values in any dumping duty notice later published.

Wei Dat Steel Wire Sdn Bhd, Malaysia (Wei Dat)³

We outline the deficiencies in the response to exporter questionnaire of Wei Dat:

- At p. 24 concerning "domestic sales", Wei Dat supplies no relevant answer to the question:

'Are you claiming a date other than the invoice date as the date of sale?'

Wei Dat's response:

'Domestic commercial arrangements are administered through internal operational procedures and recorded within accounting records submitted confidentially.'

- At p. 30 concerning "third country sales", Wei Dat again supplies no relevant answer to the question:

'What date are you claiming as the date of sale?'

Wei Dat's response:

'Supporting export documentation demonstrating transaction traceability has been submitted confidentially.'

- At pp. 27-29 concerning adjustments and "Due Allowance" [Section E], Wei Dat provides responses that are incapable of allowing a reasonable understanding of the substance of the information provided with respect to the exporter's claims for adjustment in terms of packaging differences, delivery differences,

³ EPR 692/013

other direct selling expenses or other adjustment claims. Every response refers to information or calculations:

'submitted confidentially.'

- At p. 36 ([G-7.4] to [G-7.7]) concerning all questions related to 'raw material' purchases, Wei Dat has given the implausible response of *'Not applicable'*. This is clear example of obfuscation by the exporter and amounts to the exporter failing or refusing *'to provide information relevant to the case'*.
- At pp. 45 - 57 regarding questions concerning the Malaysian domestic market (at [Section I]), and the Australian market (at [Section J]), the exporter provided two irrelevant, alternate responses to all questions, that being, either:

'Relevant internal records supporting the response have been compiled and submitted confidentially,'

or

'Supporting operational documentation maintained within company records has been submitted confidentially.'

Wei Dat's responses to the exporter questionnaire fail *'to provide information relevant to the case'* within the meaning of section 8 of the *Ministerial Direction*. In these circumstances the Commissioner may reasonably deem Wei Dat an 'uncooperative exporter' within the meaning of subsection 269T(1), and treat it as such under section 269TACAB for the purpose of determining its export prices and normal values in any dumping duty notice later published.

Anhui BRC and Ma Steel Weldmesh Co., Ltd (Anhui and Ma Steel)

We observe from the file note concerning *Exporter questionnaires received and extensions of time granted*⁴ that the responses to exporter questionnaire for Anhui and Ma Steel were due by 19 January 2026. As at the date of making this submission we have not seen the non-confidential versions of the full exporter questionnaire responses be placed on the public record. Given the elapse of over two months (66 days), we can only conclude that either the responses were not received, or if they were, they contained deficiencies that could not be quickly and easily rectified in a further response. In either case, Anhui and Ma Steel must be treated as 'uncooperative exporter' within the meaning of subsection 269T(1) for the purpose of determining their export prices and normal values in any dumping duty notice later published within the 'uncooperative exporter' category under section 269TACAB.

⁴ EPR 692/005.



Conclusions

Several exporters the subject of this investigation have failed or refused to provide adequate or complete information in their responses to the commission's exporter questionnaire, and/or sufficient disclosure of any information provided within the public record version of their responses. Either way, these exporters must be treated as uncooperative exporters under section 269TACAB.

In the case of Anhui and Ma Steel, there has been no public disclosure of their responses to the commission's exporter questionnaire. The Australian industry must conclude that their responses were irreconcilably deficient. We submit that they must be treated as 'uncooperative exporters'.

Please do not hesitate to contact your InfraBuild representative on record with any questions.

FOR AND ON BEHALF OF THE

AUSTRALIAN INDUSTRY APPLICANT