PUBLIC RECORD

Australian Government
Department of Industry, Science and Resources

Anti-Dumping Commission

Australian industry verification report

Verification and case details

Initiation date	25/11/2025	**ADN**	2025/114
Case number	692		
The goods under consideration	Certain welded steel mesh sheets		
Case type	Dumping investigation		
Australian industry	InfraBuild (Newcastle) Pty Ltd		
Location	InfraBuild Steel (Newcastle), corner Ingall and Bull Streets, Mayfield North NSW 2304		
Verification from	2/12/2025	to	4/12/2025
Investigation period	1/10/2024	to	30/09/2025

The Anti-Dumping Commission will review this report, including its views and recommendations.

This report may not reflect the Anti-Dumping Commission's final position.

Contents

Introduction

On 25 March 2025 the Commissioner of the Anti-Dumping Commission (the Commissioner), initiated an investigation following an application lodged by InfraBuild (Newcastle) Pty Ltd (InfraBuild)[1] and the Steel Reinforcement Institute of Australia (SRIA) (collectively the applicants); respectively a manufacturer, and industry association representing manufacturers, of certain welded steel mesh sheets (the goods) in Australia. The application seeks the publication of a dumping duty notice in respect of certain welded steel mesh sheets exported to Australia from the People's Republic of China (China) and Malaysia.

InfraBuild (Newcastle) Pty Ltd (InfraBuild) provided data to the Anti-Dumping Commission (the commission) in relation to dumping investigation 692 (case 692) into certain welded steel mesh sheets from China and Malaysia.

A verification team (the team) visited InfraBuild to verify whether the data InfraBuild submitted is complete, relevant and accurate for use in case 692. Anti-Dumping Notice (ADN) 2016/30 describes the commission's verification procedure.[2]

This report explains the team's key findings, including the evidence considered and material issues identified. Where InfraBuild or the team materially revised the submitted data, this report outlines the nature, extent and outcomes of these revisions. This report relates to InfraBuild and its related party manufacturers of like goods only, unless stated otherwise.

The commission prepared this report to publish on the electronic public record (EPR) for case 692.

Verification teams are authorised to conduct verifications under sections 269SMG and 269SMR of the *Customs Act 1901* (Cth) (the Act).[3]

[1] InfraBuild Australia Pty Ltd is the parent company of Infrabuild (Newcastle) and other related manufacturing entities.

[2] www.industry.gov.au/sites/default/files/adc/public-record/adn_2016-30_-exception_based.pdf.

[3] All legal citations in this report are to the Act unless otherwise stated.

1 Company background

In preparing this industry visit report, the verification team has considered:

- InfraBuild's application.
- Information received during the industry visit.
- Other documents submitted by the applicant during and after the verification.
- Relevant information from anti-circumvention inquiry case number 643 into rod in coil exported from China.[4]

1.1 Corporate structure and ownership

The applicant, InfraBuild is part of the GFG Alliance and manufactures and sells like goods to the goods subject to the application, being 'certain welded steel mesh sheets' (welded steel mesh, mesh or the goods).

InfraBuild's application is supported by its related Australian producers of mesh, The Australian Steel Company (Operations) Pty Ltd ('TASCO') and InfraBuild Construction Solutions Pty Ltd ('InfraBuild CS'). InfraBuild and TASCO are subsidiaries of InfraBuild (Manufacturing) Pty Ltd ('InfraBuild Manufacturing'), and InfraBuild CS is a subsidiary of InfraBuild Trading Pty Ltd ('InfraBuild Trading').

Both InfraBuild Manufacturing and InfraBuild Trading are ultimately owned by the parent company Liberty InfraBuild Ltd ('Liberty InfraBuild'). In addition to the production and sales of mesh, Liberty InfraBuild encompasses several entities engaged in the manufacture of other steel products that include steel reinforcing bar, rod in coil, wire, pipe and tubular products and merchant bar.

1.2 Related parties

The team examined the relationships between InfraBuild and parties involved in the production and sale of welded steel mesh.

1.2.1 Related suppliers

InfraBuild, TASCO and InfraBuild Wire Pty Ltd are related entities that supply raw materials to the InfraBuild mesh division. The mesh division operates InfraBuild mesh production plants (Newcastle New South Wales (NSW), Sunshine Victoria, Acacia Ridge Queensland and Revesby NSW) and an InfraBuild Reinforcing mesh production plant (Forrestfield, Western Australia).

The verification team did not find any evidence that these transactions were conducted on a non-arms length basis.

Consideration of the arms length nature of these transactions is discussed in section 7.2.

[4] EPR 643.

1.2.2 Related customers

InfraBuild mesh division sold like goods during the investigation period to two related distribution customers, namely the Australian Reinforcing Company ('ARC') distribution business (including ARC Reo and ARC Fences) and IBR (InfraBuild Reinforcing)[5].

ARC is owned and operated by TASCO. IBR distributed like goods to its own related distribution operations and to other related customers (ARC).

The team has found that sales to related customers are at arms length.

Consideration of the arms length nature of these transactions is discussed in section 5.1 below.

[5] A trading name of InfraBuild Construction Solutions Pty Limited.

2 Like goods manufactured in Australia

2.1 Manufacturing in Australia

InfraBuild and TASCO produce rod in coil which is the raw material feed for welded steel mesh sheets. Subsidiaries of Liberty InfraBuild also produce a wide range of steel products that include wire, tubular products, merchant bar, structural steel, bar sections, and reinforcing bar.

The InfraBuild Mesh division produces four categories of the like goods:

- Reinforcing mesh – Square, rectangular and trench
- Mine mesh
- Fence mesh
- General purpose mesh.

2.1.1 Production process

The production process is summarised as follows:

- Coils of rod in coil (raw material feed) are loaded onto payoff fingers and then butt-welded together to provide a continuous feed of rod in coil that subsequently flows continuously to the cold rolling process.
- Cold rolling reduces the diameter of the wire to the desired size and typically involves one, 2 or 3 rolls; this process changes the physical characteristics as it increases the yield strength. It is also at this point that an optional deformation pattern may be introduced, together with its certification marker (recorded on the ACRS[6] certificate) giving the mesh its identifier (roughly every 70–80 cm).
- The line wires are consolidated onto removable spools after the cold rolling process. These individual spools are loaded onto the mesh welding machine payoff with one spool providing one line wire. The number of spools required is determined by the mesh width which, in turn, determines the number of line wires required.
- Cross wires come directly off the cold rolling process and are fed over the line wires. The guillotine cuts the rolled RIC to length. The perpendicular cross wires are electrically welded to the line wires to form mesh sheets. On some mesh making equipment the cross wires may be pre-cut and fed into the welding machine via a hopper.
- Finished mesh sheets that exit the machine are stacked for transportation. Once an appropriate number of mesh sheets have been produced, they are tied by machine with a small portion of tie wire.
- Tied mesh sheets are stacked onto trucks via forklift or crane. Mesh is likewise unloaded at the delivery site via forklift or crane.

Raw materials:

- Rod in coil is produced from steel billet. For manufacturers who do not produce their own billet or rod in coil, the raw input material comprises rod in coil.

Scrap:

[6] Australasian Certification Authority for Reinforcing and Structural Steels Ltd (ABN 40 096 692 545).

- The first section of rod in coil is often unsuitable for feeding into the machine; this may be discarded as scrap to be recycled by InfraBuild in the rod in coil production process.

- Non-prime product, i.e., where wires did not weld properly, may be selectively cut off and sold as non-prime mesh.

2.2 Model control codes

The sales and costs data submitted by InfraBuild complies with the model control code (MCC) structure detailed in ADN 2025/114 and as set out in Table 1.

Category	Sub-category	Identifier	Sales Data	Cost data	Key category
Prime	Prime	P	Mandatory	Mandatory	Yes
	Non-Prime	N			
Coating	Plated or coated with zinc or with zinc alloys (e.g., zinc-aluminium, zinc-aluminium-magnesium)	G	Mandatory	Mandatory	Yes
	Other coatings (e.g., paint, plastics, polyvinyl chloride, epoxy resin)	O			
	No coating	N			
Highest nominal cross-sectional diameter (millimetres or "mm") of longitudinal members	Greater than or equal to 3 and less than 6	A	Mandatory	Optional	Yes
	Greater than or equal to 6 and less than 12	B			
	Greater than or equal to 12 and less than or equal to 14	C			
Sheet size measured by nominal area (sheet length X sheet width in m2)	Less than or equal to 3	S	Mandatory	Optional	Optional
	Greater than 3 and less than or equal to 6	M			
	Greater than 6 and less than or equal to 9	L			
	Greater than 0	XL			

Table 1: MCC Structure

InfraBuild's sales and cost data were provided in accordance with the above MCC structure.

2.2.1 Amendments to model control codes

During the verification InfraBuild did not propose any amendments to the MCC structure.

After comparing prices of different models of welded steel mesh sheets, the team does not recommend amending the MCC structure.

2.3 Verification of model control codes

Table 2 provides detail on the model control code (MCC) sub-categories were determined and verified to source documents.

Category (amend as required)	Determination of the sub-category (note evidence)
Prime	Based on product descriptions set out on tax invoices and price lists and information obtained during production tour.
Coating	Based on coating shown on commercial invoices and price lists.
Highest nominal cross-sectional diameter (millimetres or "mm") of longitudinal members	Based on nominal cross-sectional diameter listed on the commercial invoices.
Sheet size measured by nominal area (sheet length x sheet width in m2)	Based on the sheet size listed on the commercial invoice.

Table 2: MCC sub-category determination

2.4 Like goods

Like goods are defined under section 269T(1) of the Act 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 team considers that the like goods manufactured by InfraBuild are identical to, or have characteristics closely resembling, the goods exported to Australia, as they share:

- **Physical likeness:** the primary physical characteristics of the goods and locally produced goods are similar, notwithstanding variations in individual customer/technical specifications such as differences in diameter or finish.
- **Production likeness:** the like goods the Australian industry produces for sale in the Australian market is produced using a substantially similar production process and similar raw material inputs to imported goods.
- **Commercial likeness:** InfraBuild considers that imported welded steel mesh competes directly with locally manufactured welded steel mesh that has the same end-use application, for reinforcing, mining, fencing or non-reinforcing applications. Distributors, resellers and end-users purchase locally made and imported welded steel mesh and readily switch between suppliers.
- **Functional likeness:** Imported and locally manufactured welded steel mesh are considered functionally alike, having the same end-use applications in their respective market segments. That is:

- **Reinforcing mesh:** is commonly used as a concrete tensioning device in residential, commercial and infrastructure/construction applications.
- **Mining mesh:** is used to improve safety and stability in underground mining and tunnelling by acting as a critical component in the ground support system.
- **Fencing mesh:** is used to provide boundary security, safety and containment across residential, commercial and industrial applications.
- **General purpose mesh:** is typically further fabricated into non-reinforcing applications.

2.5 List of all model control codes

InfraBuild produced and sold and produced welded steel mesh sheets with the following MCCs during the investigation period:

Sales MCC		Costs MCC
P-G-A-S	P-N-A-M	P-N
P-G-A-M	P-N-A-S	
P-G-A-L	P-N-A-XL	
P-G-A-XL	P-N-B-L	
P-G-B-S	P-N-B-M	P-G
P-G-B-M	P-N-B-S	
P-G-B-XL	P-N-B-XL	
P-N-A-L		

Table 3 List of MCCs sold during investigation period

2.6 Like goods assessment

The team is satisfied that:

- Welded steel mesh sheets produced by InfraBuild are like to the goods.[7]
- At least one substantial process of manufacture of welded steel mesh sheets is carried out in Australia.[8]
- The like goods were, therefore, wholly or partly manufactured in Australia by InfraBuild.[9]
- There is an Australian industry, that includes InfraBuild, which produce like goods in Australia.[10]

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

[8] Section 269T(3).

[9] Section 269T(2).

[10] Section 269T(4).

3 Australian market

3.1 Australian market background

The Australian mesh market comprises mesh produced by Australian industry mesh manufacturers comprised of InfraBuild, Steel Reinforcement Institute of Australia ('SRIA') members and other Australian manufacturers along with imported mesh sold by exporters, importers, and traders/resellers. There are four key market segments for welded steel mesh defined by end use. Both imported and locally manufactured product is primarily purchased by distributors/end-users for supplying into the residential, commercial, mining and engineering construction sectors. The majority of models (sizes) of welded steel mesh products are typically produced to stock based on sales forecasts.

While most of welded steel mesh may be installed 'as is' for its end-use application, there are instances where further processing is undertaken. This includes cutting, bending, welding, joining or tying as required by the end-use customer, fabricator or service centre prior.

3.2 Australian market structure

3.2.1 Marketing segmentation and end uses

There are four key market segments for welded steel mesh defined by end use. Both imported and locally manufactured product is primarily purchased by distributors/end-users for supplying into the residential, commercial, mining and engineering construction sectors.

- **Concrete reinforcement**: 'reinforcing mesh' is used to add tensile strength to concrete, thereby preventing cracks, improving structural integrity, and ensuring the stability and durability of concrete structures like slabs, walls, and driveways. As a tensioning agent, reinforcing mesh works by holding concrete together, evenly distributing loads, and resisting stresses from external forces and wear and tear.
- **Mining**: 'mine mesh' is used to provide ground support in underground mines and tunnels, acting as a key component of the ground control system to prevent rockfalls and enhance stability. 'Mine mesh' reinforces the mine's roof and walls by covering loose rock between installed rock bolts, creating a safer working environment for personnel and equipment by containing detached materials and prolonging the life of the mine.
- **Fencing**: 'fence mesh' is used to provide secure barriers while maintaining visibility and airflow, serving to control access, protect property, and deter intruders. Its open design allows for unobstructed views, which is critical for security monitoring in high-security zones like airports and prisons, while the welded construction offers strength and anti-climb features.
- **General purpose**: 'general purpose mesh' is used for a wide range of steel non-reinforcing applications and DIY (do-it-yourself) projects such as fencing, shelving, cages, animal containment, trailers and gates.

3.2.2 Distribution arrangements

InfraBuild sells mesh to unrelated external steel service centres, unrelated distributors, and to its related distribution network ARC and InfraBuild Reinforcing. InfraBuild's customers are able to purchase a combination of both imported and locally produced welded mesh.

Distributors and resellers purchase locally produced or imported welded mesh to stock for re-sale to end-users in each of the market sectors.

InfraBuild's welded mesh is sold and delivered Australia-wide with the majority of the volume sold in the eastern states of Queensland, NSW and Victoria.

3.2.3 Supply

InfraBuild mainly supplies welded steel mesh to distributors/resellers. They supply customers from their most convenient InfraBuild mesh facility to allow for less transportation and shorter lead times. Sales pricing is typically issued monthly, a month prior for each category of mesh and line item.

InfraBuild typically engages with individual customers monthly to negotiate prices with agreed prices normally applied to sales occurring in the future until the next price review/update.

3.2.4 Demand

The residential and commercial construction markets are the main drivers of demand for welded steel mesh and account for the largest segment of the welded steel mesh segment. The mining and engineering construction markets are significant but are considered secondary drivers of demand for the goods and like goods.

3.3 Australian market pricing

Welded steel mesh is considered a commodity market and InfraBuild primarily competes on price due to the interchangeable nature of the product. Customers can purchase mesh from InfraBuild, other SRIA members, or import supply sources. These provide competition with each other including between Australian industry members, as well as from imported sources.

InfraBuild claims that customers often negotiate prices with them using information from import offers and other pricing movements. InfraBuild maintains a market-based pricing policy for unrelated and related customers.

3.4 Australian market size

The team has preliminarily estimated the size of the Australian market for welded steel mesh using:

- the verified domestic sales data supplied by InfraBuild Newcastle
- the sales data supplied in the application in relation to SRIA members
- InfraBuild Newcastle's estimate of the sales volumes for other Australian manufacturers of welded steel mesh sheets
- data sourced from the Australian Border Force (ABF) import database.

The information sourced from the ABF import database was determined using the relevant tariff subheadings and statistical codes for welded steel mesh, and additional filtering to

remove imports that were not considered to be the goods. The team compared the ABF volumes observed to those estimated in the application and found that import volumes from the subject countries were greater than those estimated by the applicant for each year assessed.

Figure 1 depicts the team's estimate of the Australian market size for welded steel mesh between 1 October 2021 and 30 September 2025, presented for each year ending (YE) on 30 September.

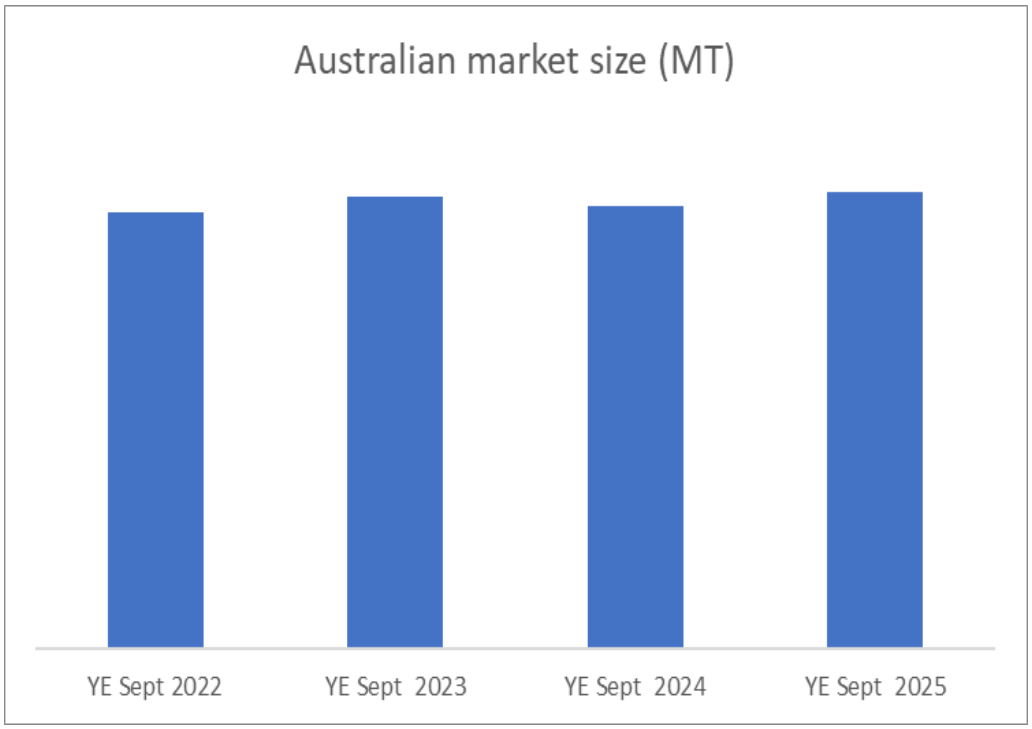

Figure 1: The commission's estimate of market size[11]

Figure 1 indicates that the size of the Australian market has been relatively stable across the period assessed, with a slight increase during the investigation period.

The team notes that its estimate of the size of the Australian market is a preliminary assessment and may change as the investigation progresses.

[11] Years represented as 1 October to 30 September. Ie. 2025 = 1 October 2024 to 30 September 2025.

4 Verification of sales completeness and relevance

The commission typically verifies sales as complete and relevant by reconciling the revenue and quantity in sales listings up to management accounts and then audited financial accounts. ADN 2016/30 further describes this verification process.

The team verified whether the sales listings InfraBuild submitted are complete and relevant by reconciling them to the audited financial statements, consistent with ADN 2016/30.

The team verified the relevance and completeness of the sales data as follows:

1. Verified the total value of sales upwards to the trial balance for the financial year ending June 2025. Reconciled the additional September 2025 quarter to the quarterly management report.
2. Reconciled from the trial balance to consolidated Financial Statements for Liberty InfraBuild manufacturing section through ledgers.
3. Verified the total volume of sales upwards to internal reporting system.

The team identified the issues outlined below during this process. Details of this verification process are contained in the verification work program and its relevant attachments, at **Confidential Attachment 1**.

4.1 Sales completeness and relevance exceptions

Exception 1: Exceptions during verification of completeness and relevance of sales data

Description: Initial data provided at application did not include data for the final sales quarter in the investigation period. InfraBuild's Western Australia (WA) sales data also was not initially included. **Resolution:** InfraBuild revised their sales data to include sales for the quarter, 1 July 2025 to 30 September. InfraBuild's WA sales were also provided.

4.2 Import sales by company

InfraBuild did not import welded steel mesh sheets during the investigation period.

4.3 Export sales by company

InfraBuild did not have export sales of the welded steel mesh sheets during the investigation period.

4.4 Sales completeness and relevance finding

The team is satisfied that the sales data InfraBuild submitted is complete and relevant, after including any revision outlined in an exception above.

5 Verification of sales accuracy

The commission typically verifies sales as accurate by reconciling a selection of volume, revenue and other key data in the sales listings down to source documents. ADN 2016/30 further describes this verification process.

The team verified whether the export and domestic sales listings InfraBuild submitted are accurate by reconciling them to source documents, consistent with ADN 2016/30.

The team did not identify any issues. The team detailed this process in the verification work program and its relevant attachments in **Confidential Attachment 1.**

5.1 Related party customers

The team observed that InfraBuild sold goods to related customers.

The team analysed the prices for unrelated and related customers over the investigation period. It did not find evidence of price discrimination between related and unrelated customers and consider the sales to related customers to be arms length.

The team observed that for sales to related and non-related customers, related party sales comprising a larger share of sales. A comparison of prices indicated a slight price differential between related and non-related transactions. The differences reflected common commercial factors including levels of trade, volume and market pricing, and pricing structures applied. Based on the sales documentation provided, the commission considers the pricing differences to be commercially reasonable.

The team is satisfied that InfraBuild's selling prices for welded steel mesh to related customers can be relied upon in the assessment of the economic condition of the Australian industry.

5.2 Sales accuracy finding

The team is satisfied that the sales data InfraBuild submitted is accurate. Details of this verification process are contained in the verification work program and its relevant attachments, at **Confidential Attachment 1**.

Accordingly, the team considers InfraBuild's sales data suitable for analysing the economic performance of its welded steel mesh operations for the investigation period (1 October 2024 to 30 September 2025).[12]

[12] InfraBuild provided sales data from 1 July 2024.

6 Verification of CTMS completeness and relevance

The commission typically verifies cost to make and sell (CTMS) as complete and relevant by reconciling the total cost to make (CTM) and selling, general and administrative (SG&A) expenses in cost listings up to management accounts and then audited financial accounts. ADN 2016/30 further describes this verification process.

The team verified whether the CTM and SG&A listings InfraBuild submitted are complete and relevant by reconciling it to audited financial statements, consistent with ADN 2016/30.

The team verified the relevance and completeness of the cost data as follows:

1. Reconciled the cost of goods sold for POI to the audited financial statements and trial balance.
2. Reconciled the cost to make for the period to the trial balance.
3. Reconciled cost of goods sales to the total company cost to make for the period.
4. Reviewed the categorisation of the cost to make of the goods and non-goods.
5. Reconciled the cost to make of the goods to the cost spreadsheets.

The team verified the relevance and completeness of the SG&A data as follows:

1. Verified the SG&A expenses for FY2025 upwards to the management reports, online accounting system and trial balance.
2. Reconciled SG&A expenses to the investigation period through online accounting system trial balances for selected periods.

The team did not identify any issues during this process, other than the exception noted below, which was rectified shortly after the visit. Details of this verification process are contained in the verification work program and its relevant attachments, at **Confidential Attachment 1**.

6.1 CTMS completeness and relevance exceptions

Exception 2: Exceptions during verification of completeness and relevance of sales data

Description: Initial data provided in the application did not include CTM data for the final quarter in the investigation period. InfraBuild's WA CTM data also was not initially included in their submitted data.

Resolution: InfraBuild revised their CTM data to include sales for the quarter, 1 July 2025 to 30 September. InfraBuild's WA CTM data were also provided.

6.2 CTMS completeness and relevance finding

The team is satisfied that the CTMS data provided in the application by InfraBuild, including any revision outlined in an exception above, is complete and relevant.

7 Verification of cost to make and sell accuracy

The commission typically verifies CTMS as accurate by reconciling a selection of volume, cost and other key data in the CTM and SG&A listings down to source documents. ADN 2016/30 further describes this verification process.

The team verified whether the CTM and SG&A listings InfraBuild submitted are accurate by reconciling them to source documents, consistent with ADN 2016/30.

The team did not identify any issues. The team detailed this process in the verification work program and its relevant attachments in **Confidential Attachment 1**.

7.1 Cost allocation method

Table 4 outlines how the team allocated each cost component.

Cost component	Method applied
Raw materials	Allocated based on production quantity. Reconciled to cost accounting system and source documents.
Direct labour	Allocated based on production quantity. Reconciled to cost accounting system.
Manufacturing overheads	Allocated based on production quantity. Reconciled to cost accounting system and source documents.
Depreciation	Allocated based on production quantity. Reconciled to cost accounting system.

Table 4: Cost allocation method

7.2 Related party suppliers

To manufacture welded steel mesh sheets, InfraBuild (mesh business) purchased materials from its related entities, InfraBuild (Newcastle), TASCO and InfraBuild Wire Pty Ltd, during the inquiry period.

The verification team did not find any evidence that these transactions were conducted on a nom-arms length basis.

The team notes that InfraBuild purchased a small volume of rod in coil from imported sources. The team did not find evidence of major price differences between related and unrelated suppliers and consider the supply of raw materials from related parties to be arms length.

7.3 Cost to make and sell accuracy finding

The team is satisfied that the CTMS data InfraBuild submitted is accurate and reasonably reflects the costs associated with the manufacture and sale of the welded steel mesh sheets.

8 Economic condition

8.1 Applicant's injury claims

In its application for a dumping investigation, InfraBuild (and other SRIA members) (the applicants) claimed that the Australian industry has experienced injury in the form of:

- loss of sales volume
- loss of market share
- price depression
- price suppression
- loss of profits
- reduced profitability
- reduced revenue
- reduced return on investment
- reduced capacity utilisation
- increased stock holding
- loss of employment and reduced wages
- reduced productivity.

In its application, InfraBuild claimed that material injury from the dumped imports was present during its proposed investigation period (1 July 2024 to 30 June 2025).[13]

8.2 Approach to injury analysis

This chapter details the team's assessment of the economic condition of InfraBuild from 1 October 2021 (the injury analysis period). Each year presented is based on the period 1 October to 30 September.

The analysis detailed in this chapter is based on verified financial information submitted by InfraBuild, information contained in the application relating to production and sales volumes for other Australian industry participants, and data from the ABF import database.

The supporting calculations and evidence are provided in **Confidential Appendix 1**.

8.3 Volume effects

8.3.1 Sales volume

Figure 2 below outlines InfraBuild's total sales volumes for welded mesh over the injury analysis period.

[13] EPR 692/001, *Application*, p. 63.

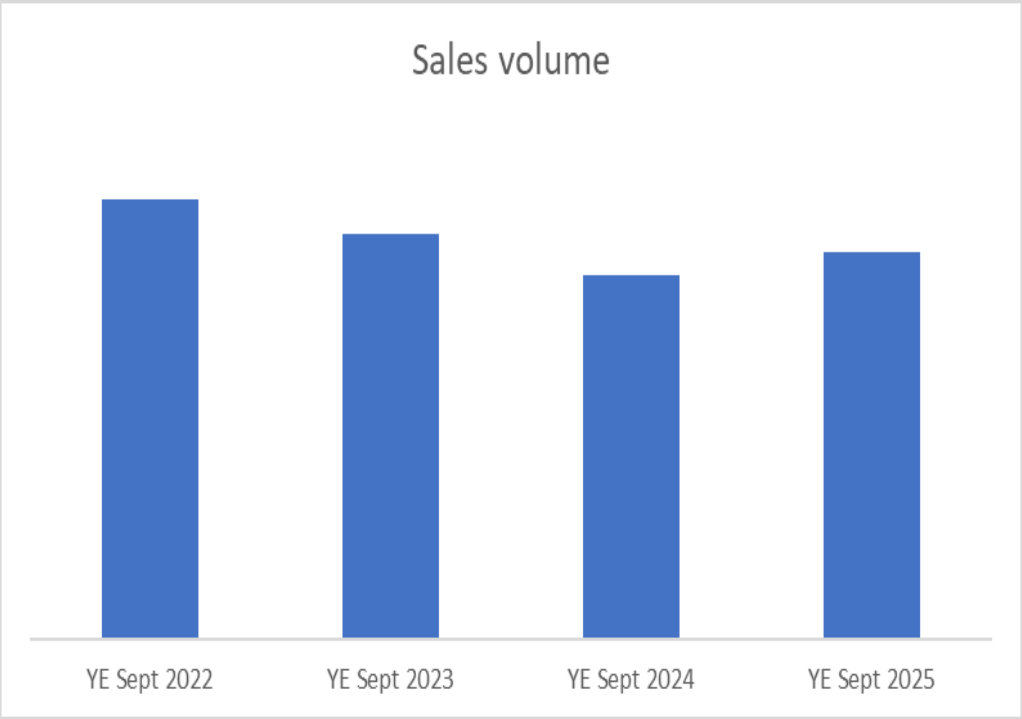

Figure 2: InfraBuild sales volume

Figure 2 shows that InfraBuild's sales volumes declined year on year from YE September 2022 to 2024, followed by an improvement in the investigation period. While InfraBuild has experienced an improvement in sales volume during the investigation period, sales volumes remain well below 2022 levels, suggesting sustained market pressures despite the improvement.

Based on this analysis, the team considers that InfraBuild has experienced injury in the form of loss of sales volume during the injury analysis period, however, has experienced an improvement during the investigation period. InfraBuild has attributed this improvement to the influence of the commission's *Anti-circumvention Inquiry No. 643* , which examined the circumvention by slight modification of rod in coil to certain models of welded steel mesh sheets.[14]

8.3.2 Production volume

Figure 3 outlines InfraBuild's total production volumes for welded steel mesh over the injury analysis period.

[14] *Anti-circumvention Inquiry No. 643* had an initiation date of 9 May 2024 and a SEF publication date of 21 July 2025. SEF 643 recommended the termination of the inquiry.

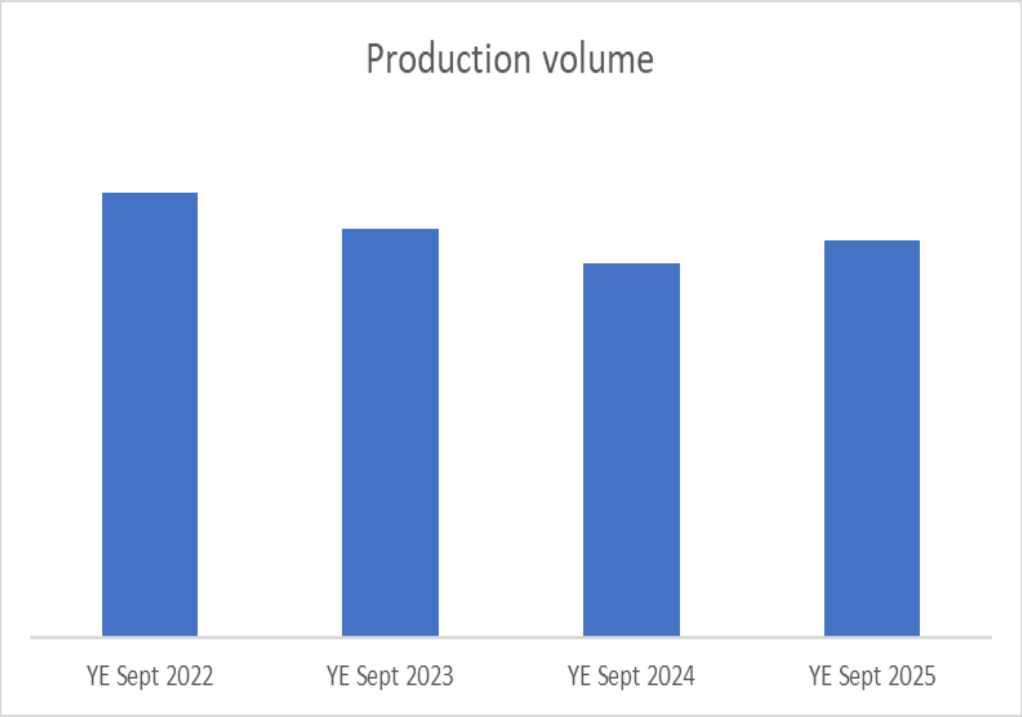

Figure 3: InfraBuild production volume

Following a similar trend to sales volume, InfraBuild's production volume declined each year from 2022 to 2024, followed by an increase during the investigation period. Production volumes remain well below 2022 levels, mirroring sales volume trends.

Based on this analysis, the team considers that InfraBuild experienced injury in the form of loss of production volume during the injury analysis period, however, has experienced an improvement during the investigation period when compared to the immediate, previous 12-month period.

8.3.3 Market share

Figure 4 outlines InfraBuild's market share for welded steel mesh over the injury analysis period as well as the market share estimate for the remainder of the Australian industry and imports from subject countries (China and Malaysia), and other countries.

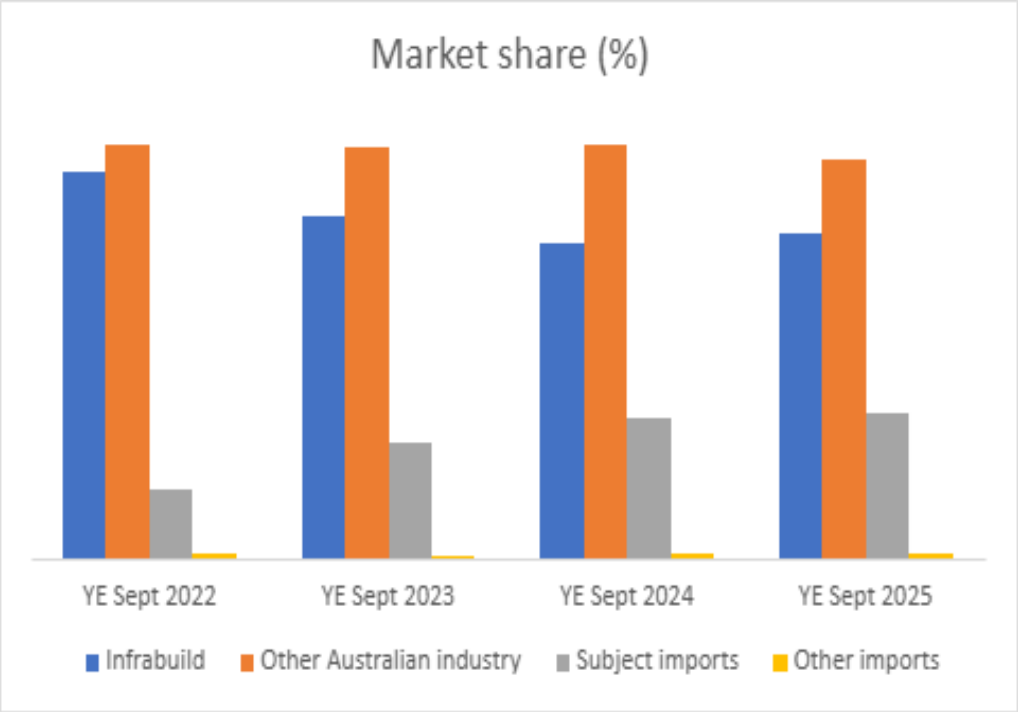

Figure 4: Australian Industry market share

Figure 4 indicates that InfraBuild (and the Australian industry in totality) have lost market share over the injury analysis period. InfraBuild have however increased market share during the investigation period. InfraBuild has attributed this improvement to the influence of the commission's *Anti-Circumvention Inquiry No 643*. The team observed that there has been a year-on-year increase in the market share of the subject countries across the injury analysis period, including during the investigation period.

Having regard to the analysis and observations outlined above, it is not apparent that InfraBuild has experienced injury in the form of lost market share during the investigation period when compared to the immediate, previous 12-month period. InfraBuild has attributed this improvement to the influence of the commission's Anti-Circumvention Inquiry No. 643.

Further analysis about the composition of the Australian market, including the volume of sales by other Australian industry participants, will therefore be undertaken during the investigation.

8.4 Price effects

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

Figure 5 outlines InfraBuild's unit selling price against its unit CTMS for welded mesh over the injury analysis period.

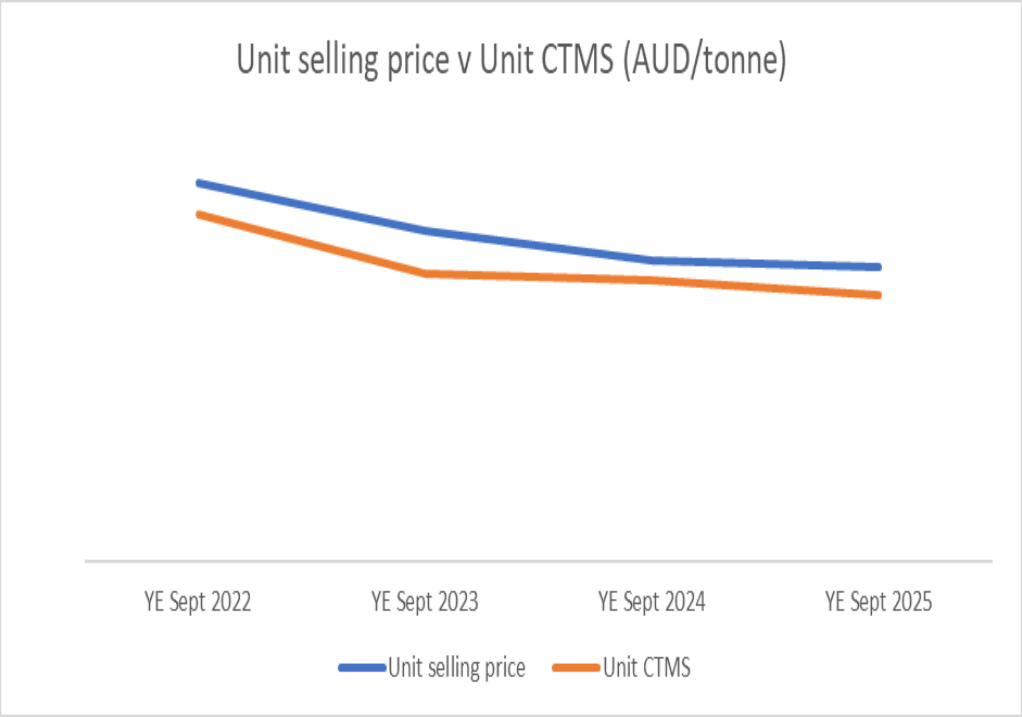

Figure 5: Unit selling price and Unit CTMS

Figure 5 indicates that InfraBuild has lowered its prices over the course of the injury analysis period, including during the investigation period. The rate of reduction observed during the investigation period was lower than the preceding years. The team considers that InfraBuild has experienced injury in the form of price depression during the investigation period.

The team further noted that during the year ending September 2024, InfraBuild has decreased prices at a greater rate than the reduction in CTMS, indicating price suppression. This trend did not however continue into the investigation period where prices were observed to have reduced at a slower rate than the reduction in CTMS.

Based on this analysis, the team considers that InfraBuild has suffered injury in the form of price depression during the investigation period. While price suppression is evident across the injury analysis period, it is not evident in the investigation period when compared to the immediate, previous 12-month period. InfraBuild has attributed this improvement to the influence of the commission's *Anti-Circumvention Inquiry No. 643*.

8.5 Profit and profitability

Error! Reference source not found. outlines InfraBuild's unit profit and profitability from welded steel mesh over the injury analysis period.

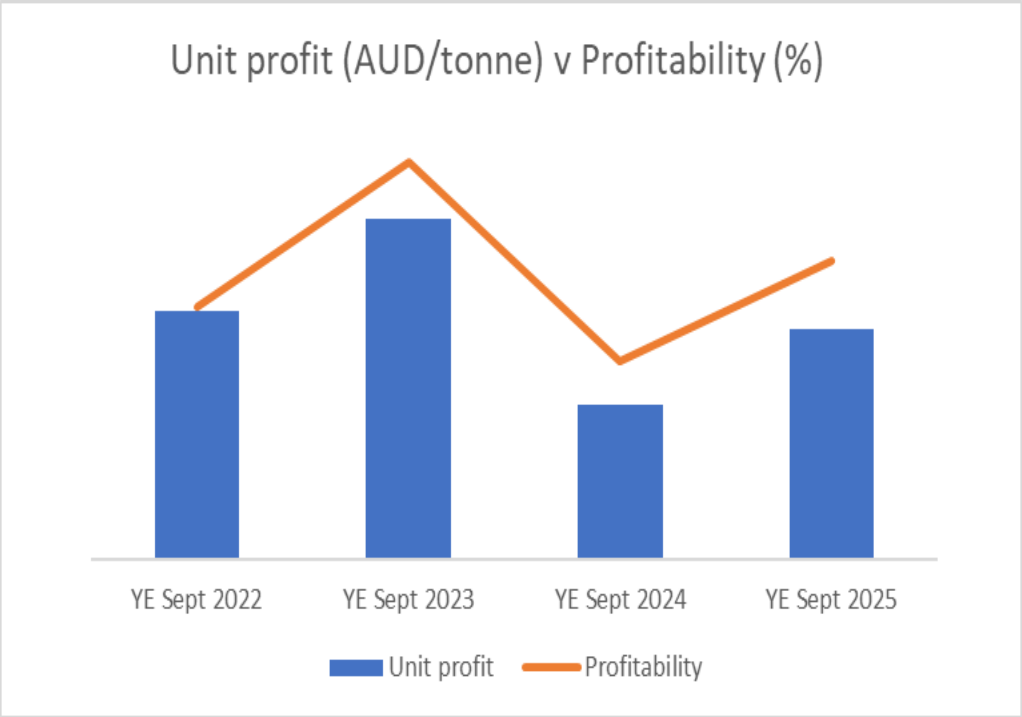

Figure 6: Unit selling price and Unit CTMS

During the injury analysis period, InfraBuild's unit profit and profitability reached their highest level in year ending September 2023, which was a significant recovery compared to 2022. This peak was followed by a sharp decline in 2024. The team noted that during 2024 InfraBuild had a significant one-off increase in SG&A expenses which contributed materially to the reduction in profit observed in this year. InfraBuild experienced improved profit and profitability during the investigation period however unit profit and profitability remained below the levels achieved in 2023.

Based on this analysis, the team considers that InfraBuild experienced injury in the form of loss of profit and profitability during the injury analysis period. However, the team considers that InfraBuild has not experienced injury in the form of loss of profits and reduced profitability in the investigation period when compared to the immediate, previous 12-month period. InfraBuild has attributed this improvement to the influence of the commission's *Anti-Circumvention Inquiry No. 643.*

8.6 Other economic factors

InfraBuild claimed that it had suffered injury in the form of:

- reduced revenue
- reduced return on investment
- reduced capacity utilisation rates
- reduced productivity
- lost employment and wages
- increased stock holding

Table 5 shows the change or variation in the other economic factors for InfraBuild during the injury analysis period. It is noted that these factors are reported on a financial year (FY) basis (1 July to 30 June).

Injury factor	FY 2022	FY 2023	FY2024	FY 2025
Revenue	100	85	66	68
Return on investment	100	242	77	93
Capacity utilisation	100	93	83	88
Employment	100	86	85	95
Productivity	100	101	98	95
Stock holding	100	89	82	110
Wages	100	72	79	82
Capital investment	100	159	201	350
Assets	100	96	105	135

Table 5: Other injury factors (indexed)

Table 5 indicates that InfraBuild has suffered injury over the period of analysis in relation to several economic factors. InfraBuild has increased its capital investment year on year, with substantial increase in FY 2025. This has had a flow on effect with value of assets also increasing.

8.7 Conclusion

Based on an analysis of the information contained in the application and obtained and verified during the visit, the team considers that InfraBuild has experienced injury over the injury analysis period in the form of:

1. loss of sales volume
2. loss of market share
3. price depression
4. price suppression
5. loss of profits
6. reduced profitability
7. reduced revenue
8. reduced return on investment
9. reduced capacity utilisation
10. increased stock holding
11. loss of employment and reduced wages
12. reduced productivity.

In terms of the investigation period, when compared to the immediate, previous 12-month period, the team considers that InfraBuild has experienced injury in the form of:

1. price depression
2. increased stock holding
3. reduced productivity.

9 Causal link claims

9.1 Background and approach to analysis

Under section 269TG, one of the matters that the Minister must be satisfied of in order to publish a dumping duty notice is that material injury to an Australian industry producing like goods has been or is being caused or is threatened.

The team discussed with InfraBuild whether the alleged dumping of imported welded steel mesh can be demonstrated to be causing material injury to the Australian industry and collected evidence to support those claims. The commission will consider the evidence further during the course of the investigation.

The team also examined factors other than dumping to consider whether these may be causing injury.

9.2 Volume effects

During the verification the team discussed the effect of exports on InfraBuild's sales volume of welded steel mesh. InfraBuild claims a loss in welded steel mesh sales volume during the injury analysis period, attributed to an increase in dumped exports. InfraBuild claims that this has resulted in a loss in their market share despite the size of the whole market increasing.

InfraBuild sighted the Evergrande collapse in China as one of the factors that has resulted in Chinese exporters seeking new markets.[15] They also sighted that with a return to normalised shipping costs, post Covid-19, allowed for export volumes from China and Malaysia to increase after 2022.

InfraBuild stated that the market is price driven with customers able to shop around and switch their suppliers. They claim that lower prices are placing pressure on maintaining sales volumes and market share.

InfraBuild claims that the reduction in market share and sales volume also contributed to InfraBuild experiencing a notable increase in their closing stock-on-hand during the injury analysis period. It is also claimed that revenue fell considerably across the injury analysis period, primarily due to lower sales volumes and higher stock-on-hand and reduced revenue resulted in decreased capacity utilisation.

9.3 Price effects

As mentioned, InfraBuild claims that the welded steel mesh market is highly price driven, where customers can change suppliers easily as the welded steel mesh sheets are sold and priced primarily by reference to prevailing market and import prices.

InfraBuild stated that it has adjusted its prices to respond to import price pressures from exports in an attempt to maintain both market share and production volume. InfraBuild provided several examples of customers advising InfraBuild of import pricing offers that they have received. InfraBuild claims that it has then lowered prices when importers undercut the market, based on intelligence in the form of importer prices to the distributors and public.

[15] China Evergrande Group collapse in 2021.

InfraBuild stated that it has moved towards an import responsive pricing model over 18 months ago to account for these price pressures and compete with the increasing volume of the imported goods. InfraBuild also used various pricing structure models designed to counter lower priced imports. While InfraBuild advised they will seek a price premium based on domestic manufacturing advantages, this premium is still tethered to import pricing.

InfraBuild claimed that the pricing strategy was necessary to retain customers and prevent declining sales, directly linking imports to reduced sales volumes in the Australian industry.

In addition, InfraBuild provided details on the closure of its WA mine mesh manufacturing business in 2024. It is claimed that this was because of direct competition from lower priced exports from China and Malaysia. InfraBuild provided pricing offers its previous WA customers had received from importers.

9.4 Profit and profitability

InfraBuild claimed that, in terms of the value of lost profit, the financial impact was substantial for its sales of like goods. InfraBuild claims its lost sales revenue caused by the price depression experienced in the injury analysis period has resulted in a loss of profitability.

InfraBuild claims that its sales revenue was noticeably lower than it would have been but for the price depression and suppression experienced during the injury analysis period.

9.5 Other economic factors

The team discussed with InfraBuild that the claimed injury experienced in the form of volume effects, price effects and profit and profitability have all influenced the other economic factors outlined in chapter 8.6.

9.6 Injury caused by factors other than dumping

InfraBuild does not consider that there are factors other than dumping that have caused injury to the Australian welded wire mesh industry.

10 Appendices and attachments

Confidential attachment 1	Verification work program
Confidential appendix 1	Economic condition of the industry