

20 MAY 2026

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

**BY EMAIL:**

**investigations1@adcommission.gov.au**

Dear Director,

**RE: Dumping Investigation No. 692 - Certain welded steel mesh sheets exported from the People's Republic of China and Malaysia**

**AUSTRALIAN INDUSTRY SUBMISSION**

InfraBuild (Newcastle) Pty Ltd (**InfraBuild**) is an Australian industry applicant<sup>1</sup> for the publication of a dumping duty notice in respect of certain welded steel mesh sheets (**mesh**) exported to Australia from the People's Republic of China (**China**) and Malaysia. InfraBuild makes the following submission in response to the recent amendments to Model Control Codes (**MCCs**) proposed by Malaysian exporter Kamen Steel Industries Sdn. Bhd. (**Kamen**) in their submission dated 12 May 2026<sup>2</sup>.

**1. Proposed amendments are well past due date**

At the outset, it should be noted that 'Key Dates' on the electronic public record for Investigation No. 692 specifies '*Proposals to modify the proposed MCC structure due **no later than 2 January 2026***'. The Initiation Notice<sup>3</sup> for the investigation published on 25 November 2025 also referenced this date, advising all interested parties, including the exporters, that '*proposals to modify the proposed MCC structure should be raised as soon as is practicable, but **no later than 2 January 2026***.'

The only public record request for an amendment to the proposed MCC structure was made by another Malaysian mesh exporter, Southern Steel Mesh Sdn Bhd (**SSM**). The submission (one-page table) was not dated but was presumably received by the 2 January 2026 deadline as it

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<sup>1</sup> Joint application with the Steel Reinforcement Institute of Australia (SRIA)

<sup>2</sup> EPR692/028 *Exporter – Kamen Steel Industries Sdn Bhd – Submission on Model Control Code Structure*

<sup>3</sup> ADN 2025/114 *Initiation of Investigation 692* (25 November 2025)

was published on the public record for the investigation on 5 January 2026. The modification proposed<sup>4</sup> was the inclusion of an additional subcategory ‘*Greater than 14mm*’ to be added to the ‘*highest nominal cross-sectional diameter of longitudinal members*’ MCC category. InfraBuild did not respond to this modification proposal as the goods description already established the maximum cross-sectional diameter of members as 14mm (inclusive).

Kamen was granted an extension to 16 January 2026 and a further extension to 23 January 2026 to provide their Response to Exporter Questionnaire (REQ)<sup>5</sup> and did not raise any concerns about the MCC structure at that time. Kamen’s REQ, provided a list, coded according to the initial proposed MCC structure, of MCCs sold domestically and exported to Australia as required by the exporter questionnaire.

#### Kamen Export MCCs

P-N-A-L  
P-N-A-XL  
P-N-B-S  
P-N-B-M  
P-N-B-L  
P-N-B-XL

#### Kamen Domestic MCCs

- P-N-A-S
- P-N-A-M
- P-N-A-L
- P-N-A-XL
- P-N-B-S
- P-N-B-M
- P-N-B-L
- P-N-B-XL
- P-N-C-L
- P-N-C-XL
- P-G-A-S
- P-G-A-M

The recent request by Kamen for changes to the MCC structure has been provided more than four months after the due date for submissions and the Commissioner of the Anti-dumping Commission (**Commissioner**) is not obliged to accept this late MCC change proposed by this exporter.

The Anti-dumping Notice concerning the introduction of Model Control Codes<sup>6</sup> advises that ‘*proposals to modify the MCC structure should be raised before submitting a response to the exporter questionnaire and placed on the public record prior to any verification, otherwise the response may be deemed deficient*’. Failure to establish a consistent MCC structure applicable to all exporters means that the intent of the MCCs, that is, ‘*to facilitate a consistent approach to the collection of financial data in responses to exporter questionnaires and calculating dumping margins*’<sup>7</sup> cannot be met.

<sup>4</sup> EPR692/006 Exporter – Southern Steel Mesh Sdn Bhd – Submission on Model Control Code Structure

<sup>5</sup> EPR692/005 Amendment to REQ status update - Exporter questionnaires and extension of time granted

<sup>6</sup> ADN No. 2018/77 Consultation on the introduction of Model Control Codes at p5

<sup>7</sup> ADN No. 2018/77 at p1

While the Notice states that the ‘*MCC structure may be modified during exporter verification visits based on the facts and evidence pertaining to a particular exporter*’, MCC changes at verification should only be considered under exceptional circumstances where the price comparability relating to a particular feature is very specific to a single exporter only and where it is not already addressed by an existing MCC category relevant to and applied by all other exporters when completing their questionnaire responses.

## 2. Proposed amendments are already accommodated in the MCC structure

The goods description includes all subject welded mesh sheets of a *maximum nominal length of up to and including 15 metre and includes sheets that may have bends*. As such, the goods description also includes all cut-to-size (per project or customer requirements) mesh sheets.

The exporter claims that an additional MCC category is required to ‘*incorporate an additional product characteristic reflecting product type*’ to enable a ‘*commercial distinction between standard mesh and CTS/project mesh products*’ that is, mesh sheets that have been cut-to-size.

It is InfraBuild’s view that the MCC category of ‘*Sheet size measured by nominal area (sheet length x sheet width in m<sup>2</sup>)*’ already provides a meaningful product characteristic (sheet size/area) which, at a model comparison level, is able to distinguish price comparability between standard mesh and cut-to-size project mesh for all exporters and the Australian industry. The four subcategories ‘S, M, L and XL’ should reflect price extras that apply to cut-to-size mesh (eg. small, medium, large sized sheets) when compared to extra-large sheets (standard mesh sheet sizes produced in large volumes off a mesh machine).

In the briefing<sup>8</sup> provided by InfraBuild to the Anti-dumping Commission verification team prior to their visit to Kamen, the sheet size category and its relevance to price comparability was directly addressed:

- **Sheet size effect on pricing:** InfraBuild noted that ‘*Non-standard sheet sizes > standard sheet sizes*’ with a further note clarifying ‘*smaller sheet sizes within a given coating and diameter category attract a premium as cutting is needed and handling and storage complexity is added*’.
- **Standard sheet size in the Malaysian market:** InfraBuild provided an extract from the REQ for Southern Steel Mesh Sdn Bhd (**SSM**) which stated that ‘*in the domestic market,*

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<sup>8</sup> EPR692/020 at p 7

*the standard sheet dimension is fixed at 6.00 x 2.20m* equating to a sheet size of 13.2m<sup>2</sup> (or 'XL' in MCC Sheet Size category 'Greater than 9').

- **Completeness of export and domestic sales:** InfraBuild requested that the verification team confirm completeness of the export sales listing provided by Kamen in their REQ given evidence to suggest that sales of MCC sheet size 'S' goods and galvanised goods (MCC Coating 'G') had potentially been excluded<sup>9</sup>.

### **3. Other Malaysian exporters also referenced the impact of sheet size on price premiums**

InfraBuild's briefing included the statement contained in the REQ for SSM that *'cut-to-size mesh is different from standard sheet mesh as there is a value-added service rendered to the end user. Hence the price is usually higher than the standard sheet'*<sup>10</sup>. This statement reinforced the expectation that when the verification team assessed domestic sales models of the Malaysian exporters, price comparability as affected by the mesh sheet dimensions (as appropriately addressed by the MCC physical property category of mesh sheet size) would be apparent.

Given that cut-to-size mesh is a higher value product commonly sold by exporters other than Kamen (including SSM) and is readily differentiated by the 'Sheet Size' MCC category, there is no justification for making bespoke changes to the MCC structure for Kamen alone, potentially undermining the fairness and integrity of the Anti-dumping system for industry and the other exporters.

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

FOR AND ON BEHALF OF THE

**AUSTRALIAN INDUSTRY APPLICANT**

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<sup>9</sup> EPR692/020 at pp 12-13

<sup>10</sup> EPR692/012 at p 28