

11 June 2026

The Director, Investigations 1
Anti-Dumping Commission
Investigations 2
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Public File

Dear Director,

Investigation No. 692 concerning certain welded steel mesh sheets exported from China and Malaysia

I. Introduction

As part of the Jenmar organizational group, Dynamic Mesh & Wire Industries Sdn Bhd (**DMW**) is an exporter of certain welded steel mesh sheets the subject of Investigation No. 692 (**INV 692**). DMW primary manufactures and exports welded steel mesh sheets for use as ground support in underground mining operations (**mine mesh**).

This submission concerns the Model Control Code (**MCC**) structure proposed by the by InfraBuild (Newcastle) Pty Ltd and the Steel Reinforcement Institute of Australia (together, **the Applicant**) at Section A-4.11 of the application. DMW proposes the addition of a single new MCC category to enable the Anti-Dumping Commission (**the Commission**) to differentiate welded steel mesh sheets by a verifiable physical attribute of the longitudinal members.

II. Background

At Section A-4 of the application, the Applicant identifies four product categories within the goods description: reinforcing mesh, mine mesh, fence mesh, and general purpose mesh. The Applicant separately describes each category in terms of its physical specifications, applicable standards, manufacturing locations, end uses, and customer segments.

Notwithstanding this differentiation, the MCC structure proposed does not distinguish between the four product categories. The proposed MCC structure comprises four categories: quality; coating; nominal diameter; and sheet size. Each of these apply across all four product categories uniformly.

The Applicant identifies the price comparability characteristics affecting welded steel mesh sheets in the following order of significance: (a) prime versus non-prime; (b) coating versus no coating; (c) highest nominal cross-sectional diameter of longitudinal members; and (d) sheet size measured by nominal area. Critically, the MCC structure does not address the distinction between welded steel mesh sheets manufactured from deformed wire to AS/NZS 4671:2019 and welded steel mesh sheets manufactured from smooth wire to proprietary specifications.

III. New MCC category required

DMW submits that the proposed MCC structure should be amended to include a new segment, “Wire finish”, positioned as the first segment in the MCC. The new segment captures an objectively verifiable physical attribute of the longitudinal members that is determinative of product category, applicable manufacturing standard, and end-use suitability.

The proposed new segment would comprise two sub-categories:

- a. “S” – smooth wire with flush cut ends; and
- b. “R” – deformed (ribbed) wire, with or without flush cut ends.

Welded steel mesh sheets manufactured for the reinforcement of concrete in accordance with AS/NZS 4671:2019 are produced from deformed (ribbed) longitudinal wires.¹ The deformed surface profile is mandated by the standard to provide the mechanical bond between the steel and the surrounding concrete that is necessary for the tensile reinforcement of concrete structures. Welded steel mesh sheets so produced fall within sub-category “R”.

Mine mesh, and certain fence and general purpose mesh, are produced from smooth (plain) longitudinal wires. Mine mesh is supplied as sheets with flush-cut ends to enable bolt-up installation against rock surfaces in underground mining ground-support applications. Welded steel mesh sheets so produced fall within sub-category “S”.

The proposed amendment provides a verifiable physical-attribute test that captures all reinforcing mesh in sub-category “R” and all mine mesh in sub-category “S”. The objective of this new MCC category is to ensure that mine mesh is not compared with reinforcing mesh in the calculation of dumping margins, the assessment of price undercutting, or the determination of material injury.

IV. Proposed amended MCC structure

DMW proposes that the MCC structure be amended as set out in Table 1 below. The new category is added at Position 1, with the four existing categories retained without amendment at Positions 2 to 5.

¹ AS/NZS 4671:2019 *Steel for the reinforcement of concrete*.

Table 1 — Proposed amended Model Control Code structure

Position	Category	Sub-category	Identifier	Sales	Cost
1 (new)	Wire finish	Smooth wire with flush cut ends	S	Mandatory	Mandatory
		Deformed (ribbed) wire, with or without flush cut ends	R	Mandatory	Mandatory
2	Prime	Prime	P	Mandatory	Mandatory
		Non-prime	N	Mandatory	Mandatory
3	Coating	Plated/coated with zinc or zinc alloys (e.g. zinc-aluminium, zinc-aluminium-magnesium)	G	Mandatory	Mandatory
		Other coatings (e.g. paint, plastics, polyvinyl chloride, epoxy resin)	O	Mandatory	Mandatory
		No coating	N	Mandatory	Mandatory
4	Highest nominal cross-sectional diameter of longitudinal members (mm)	≥ 3 and < 6	A	Mandatory	Optional
		≥ 6 and < 12	B	Mandatory	Optional
		≥ 12 and ≤ 14	C	Mandatory	Optional
5	Sheet size — nominal area (length x width, m ²)	≤ 3	S	Mandatory	Optional
		> 3 and ≤ 6	M	Mandatory	Optional
		> 6 and ≤ 9	L	Mandatory	Optional
		> 9	XL	Mandatory	Optional

V. Reasoning

Physical characteristics

The presence of deformations on the surface of the goods is the defining physical and engineering characteristic, mandated by AS/NZS 4671:2019.²

Deformed goods can be distinguished from smooth wires by visual inspection, by tactile examination, and by measurement of the rib pattern using standard methods. The flush-cut end condition is similarly verifiable by direct observation of the wire termination at the perimeter of the sheet. The proposed new MCC Category is therefore objectively verifiable by the Commission.

² Ibid.

Characteristics of the goods

The Applicant describes reinforcing mesh as being manufactured to AS/NZS 4671:2019 and as the only category of welded steel mesh subject to ACRS accreditation. The Applicant separately describes mine mesh as being produced to proprietary specification, not produced to AS/NZS 4671:2019, and not eligible for ACRS accreditation.

The deformed wire surface that defines reinforcing mesh is the physical signature of the AS/NZS 4671:2019 specification. The proposed Wire finish segment captures the same distinction in objective physical terms, without requiring the Commission to interrogate end-use declarations or contractual purchase descriptions.

Price comparison and injury analysis

Without the proposed amendment, the Commission's analysis would aggregate sub-category "R" and sub-category "S" goods within common MCCs, with consequent risk of distortion of:

- the dumping margin calculation, by matching imported mine mesh against domestic normal values for reinforcing mesh, or vice versa;
- the price effects analysis, by averaging mine mesh prices with reinforcing mesh prices, with the consequence that the Australian industry's reinforcing mesh price would be affected by the inclusion of higher-priced mine mesh imports; and
- the assessment of price undercutting and price suppression on reinforcing mesh which is the principal product the subject of the Australian industry's claim.

No adverse consequence for the Australian industry

To the extent that the Applicant's claim of material injury primarily concerns the production and sale of reinforcing mesh, the proposed amendment will sharpen rather than dilute the Applicant's injury case by ensuring that the reinforcing mesh price index, undercutting margins, and unit profitability indicators reflect competition from imported reinforcing mesh only, undiluted by the higher-priced mine mesh segment.

VI. Conclusion

DMW respectfully requests that the Commission amend the proposed MCC structure to incorporate a new "Wire finish" segment with sub-categories "S" (smooth wire with flush cut ends) and "R" (deformed wire, with or without flush cut ends). This will ensure that there is no cross-comparison of fundamentally different welded steel mesh sheet goods.

DMW is available to provide further technical specifications, sample products, or other information that may assist the Commission's consideration of this submission.

FOR AND ON BEHALF OF

Dynamic Mesh & Wire Industries Sdn Bhd