

10 June 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 OBSERVATIONS CONCERNING MATERIAL INJURY

InfraBuild (Newcastle) Pty Ltd (**InfraBuild**) refers to the report of the Anti-dumping Commission (**commission**) following its verification as a member of the Australian industry (**the verification report**) and makes the following observations.

InfraBuild's economic condition across the the injury analysis period

The verification report identified a trend of declining indicators year on year from YE September 2022 to 2024 followed by an improvement in the investigation period (1 October 2024 to 30 September 2025) at levels well below those in YE September 2022 and 2023. This pattern may be observed in the indicators for InfraBuild's:

- sales volume;
- production volume;

- market share;
- price effects;
- unit profit; and
- profitability.

The effect of Anti-circumvention Inquiry No. 643 (INQ 643) on InfraBuild and the Australian industry’s economic condition in the injury analysis period

INQ 643 had an initiation date of 9 May 2024 and a *Statement of Essential Facts (SEF)* publication date of 21 July 2025. SEF 643 recommended the termination of the inquiry, which occurred by Final Report published on 28 October 2025. It is observed that the entire investigation period (for INV 692) coincided with the commission’s active and public consideration of INQ 643. For all but approximately two (2) months of the investigation period (for INV 692); until the publication of SEF 643 on 21 July 2025; Australian importers of welded steel mesh sheets anticipated the risk of a notice under section 269ZDBH(1) of the *Customs Act 1901* altering the goods subject to the original notice applicable to steel rod in coil exported from China being altered to include welded steel mesh sheets, potentially with retrospective effect back to the initiation date of INQ 643 (namely, 9 May 2024). InfraBuild submits that this had a suppressing effect on export volumes from China, as the following export data demonstrates:

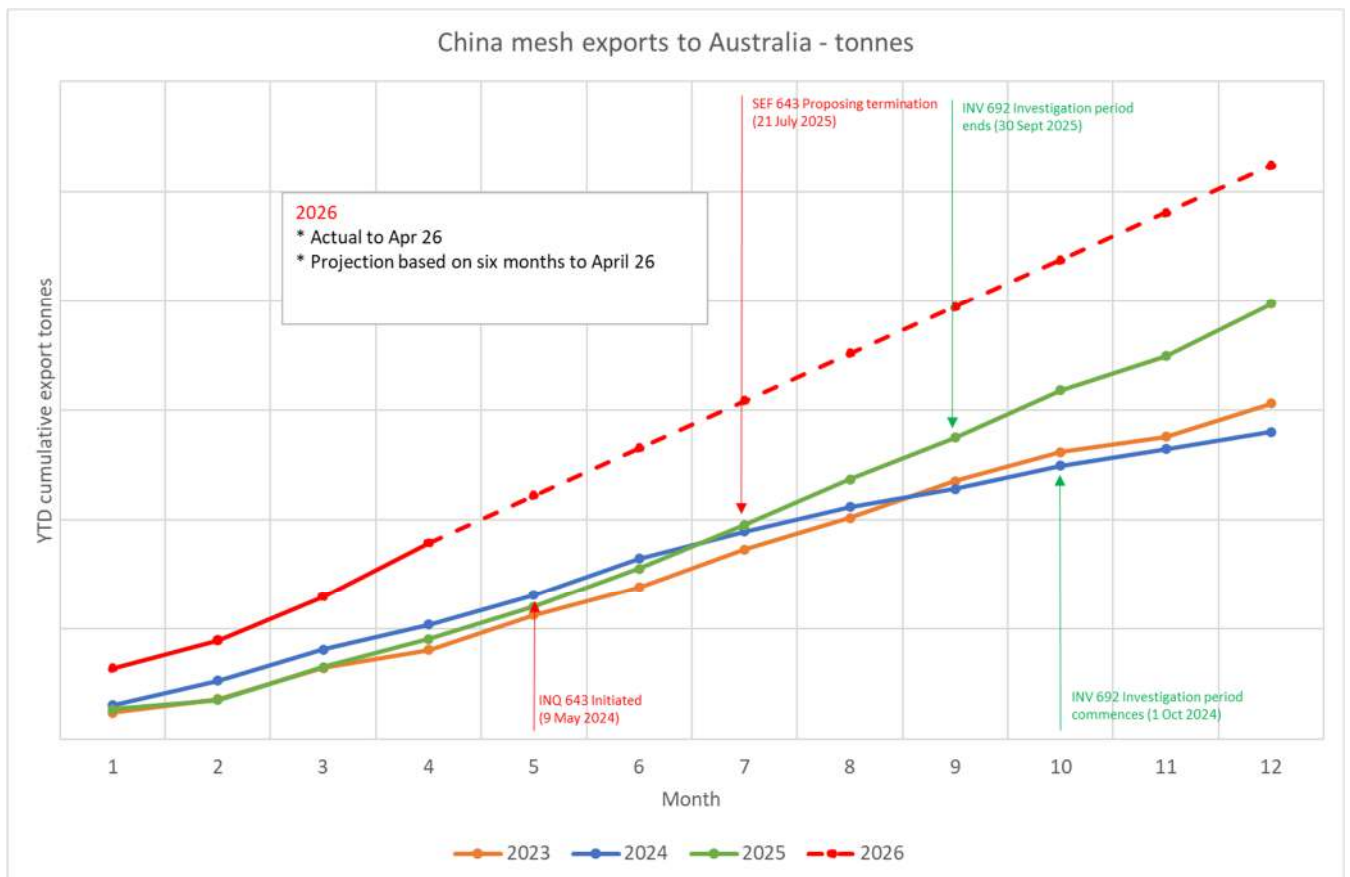


CHART 1: YTD Cumulative export tonnes of welded mesh from China to Australia by month

|| (Source: CONFIDENTIAL ATTACHMENT 1)

CHART 1, above, indicates that the initiation of the anti-circumvention inquiry (INQ 643) immediately suppressed export volumes, such that by the time the investigation period for INV 692 commenced on 1 October 2024) the cumulative YTD export volume of exports from China was 4.7% less than for the same time the previous year (October 2023). In fact, throughout the course of the anti-circumvention inquiry, the cumulative export volume of welded mesh exports from China remained below the cumulative volume for the same period the previous year. At least that was the case until SEF 643 was published on 21 July 2025, when the cumulative volume in the month that followed, August 2025, was almost 12% higher than for the same period the previous year. The investigation period for INV 692 ended the following month (30 September 2025), with export volumes again reflecting a YTD cumulative total that was 20.5% higher than for the same period the previous year.

This occurred at a time when the Australian market increased during the investigation period to its largest size across the injury analysis period. This is reflected in the commission's preliminary conclusion contained in the verification report¹ and represented in **Figure 1** to that report, reproduced below:

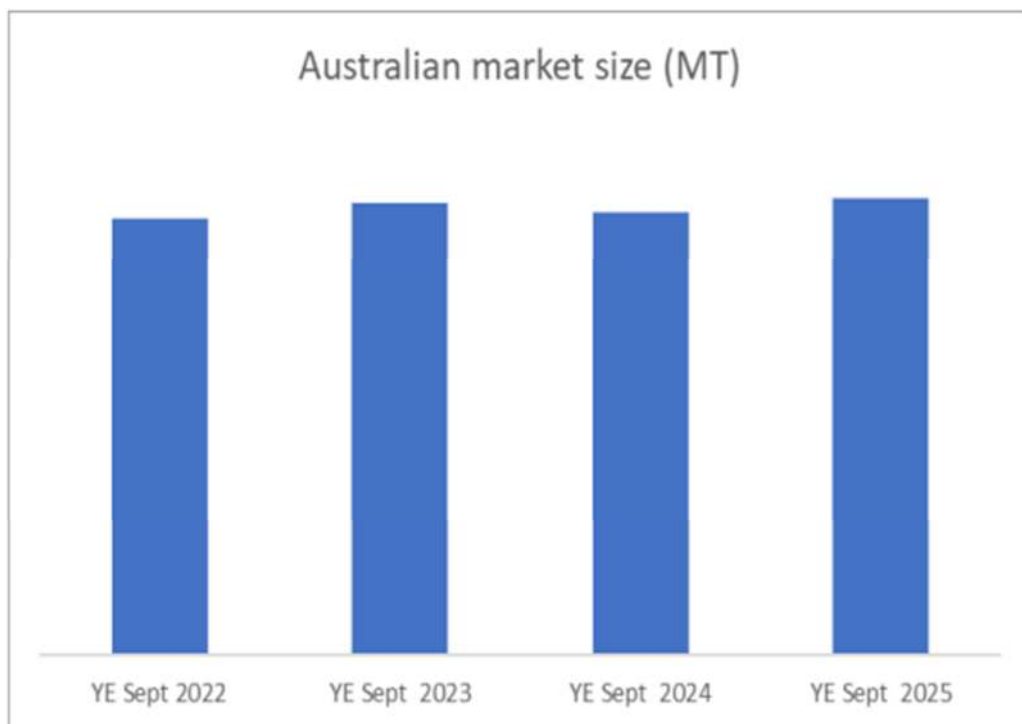


Figure 1: The commission's estimate of market size¹¹

|| **Figure 1 (reproduced)** Note: *fn 11 reads 'Years represented as 1 October to 30 September...'*

|| (Source: EPR 692/019, p. 13)

¹ EPR No. 692/019, p. 13.



Noting that the anti-circumvention inquiry (No. 643) concerned only China, and this investigation also includes goods exported from Malaysia, it is important to account for exports from Malaysia across the investigation period, and consider whether they displaced otherwise suppressed Chinese export volumes across the investigation period.

InfraBuild observes that during the investigation period, exports from Malaysia accounted for 19% of all exports from the subject countries. This is only marginally higher than the average percentage of exports from Malaysia across the injury analysis period (1 October 2021 to 30 September 2024) of 18% of all exports from the subject countries.² In other words, any suppression in export volumes from China caused by the anti-circumvention inquiry were not materially displaced by export volumes from Malaysia. This will therefore cause InfraBuild's and the Australian industry's sales volume and market share indicators to improve in the investigation period by reason of the suppressing effect of the circumvention inquiry on exports from China with limited displacement of those volumes by Malaysia.

“But for” the presence of dumped goods, the Australian industry would have secured materially improved economic conditions

Noting the growth in the size of the Australian market during the investigation period, InfraBuild considers that but for the presence of dumped goods that have undercut InfraBuild's and the Australian industry's selling prices, InfraBuild and the Australian industry would have secured a materially greater volume of sales during the investigation period.

InfraBuild considers that it could not reverse the decline in its sales to the Australian market in the investigation period because of the significant levels of price undercutting by dumped goods from China and Malaysia.³ Noting that the size of the Australian market grew in the investigation period, InfraBuild considers that but for the presence of dumped goods in the investigation period that have substantially undercut its prices, InfraBuild would have likely at least maintained a greater volume of sales volumes to these customers and arrested some of the decline in its market share which was evident in the investigation period.

Similarly, with respect to InfraBuild's price related economic indicators, noting that InfraBuild reduced its prices for like goods at a lower rate in the investigation period than in previous years, and that prices in the investigation period declined at a lower rate than the reduction in its costs, InfraBuild considers that but for the presence of dumped goods that have undercut InfraBuild's and the Australian industry's selling prices, InfraBuild and the Australian industry would have secured materially higher prices during the investigation

² CONFIDENTIAL ATTACHMENT 1.

³ In its *Application for dumping and/or countervailing duties*, InfraBuild noted that in, 'The period, April 2023 to June 2025, saw significant export price decreases in the goods from the dumped sources, which in turn caused InfraBuild Mesh to also decrease its prices by over 25% in the June 2025 quarter when compared to the base period.' (EPR 692/001, p. 68).

period; at least by the degree of the dumping margins;⁴ and secured materially higher unit profits and profitability in the investigation period.

Threat of material injury

InfraBuild maintains that the dumped goods exported from the subject countries have caused it actual and realised material injury. However, further or in the alternative, if material injury to the Australian industry is not evident in the investigation period, then InfraBuild alleges that the rapid increase in the volume of the dumped imports from the subject countries; particularly, China; following the publication of SEF 643 (21 July 2025), at increasingly higher rates of price undercutting will create a situation where the threat of material injury to the Australian industry is foreseeable and imminent. The rapid increase is observed in **CHART 1**, above, especially in the period following the end of the investigation period (reflected in the “green” (2025) line from the month of October, and the “red” (2026) line.

Conclusions

Anti-circumvention inquiry (No. 643) (INQ 643) had a suppressing effect on the volume of the goods exported to Australia from China across the investigation period. The volume of goods from the other subject country, Malaysia did not offset this loss of volume. The effect was that InfraBuild and the Australian industry replaced the suppressed Chinese volumes, as there is evidence that the overall size of the Australian market for the goods and like goods grew in the investigation period, but did so at prices that were materially less than they would otherwise have been but for the presence of dumped goods that have undercut InfraBuild’s and the Australian industry’s selling prices in the investigation period.

Similarly, but for the presence of dumped goods that undercut InfraBuild’s and the Australian industry’s selling prices, InfraBuild and the Australian industry would have secured a materially greater volume of sales during the investigation period.

Further, or in the alternative, the rapid growth in export volumes from the subject countries, especially China, in the period following the investigation period creates a situation where the threat of material injury to the Australian industry is foreseeable and imminent.

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

FOR AND ON BEHALF OF THE

InfraBuild (Newcastle) Pty Ltd

AUSTRALIAN INDUSTRY APPLICANT

⁴ These dumping margins were estimated by InfraBuild in its *Application for dumping and/or countervailing duties*, as 31.5% for China, and 10.3% for Malaysia (EPR No. 692/001, p. 113-114).