FOR PUBLIC RECORD

24 JUNE 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 RESPONSE
TO SUBMISSION NOS. 32 AND 33.

InfraBuild (Newcastle) Pty Ltd (**InfraBuild**) is an Australian industry applicant[1] 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 responds to the further submission[2] made on behalf of Malaysian exporter Kamen Steel Industries Sdn Bhd (**Kamen**) and the recent submission[3] by the Jennmar Group's Malaysian exporter, Dynamic Mesh & Wire Industries Sdn Bhd (**DMW**).

Both Kamen and DMW have proposed additional model control code (**MCC**) categories during, or after, exporter verification in order to secure, admittedly, more advantageous dumping margin outcomes.

InfraBuild considers that these proposed changes are opportunistic and raise significant procedural, fairness and verification concerns. Furthermore, the changes are not supported by the Commission's policy and practice concerning MCC protocols. Requesting these exporter-specific changes at this late stage of the investigation defeats the purpose of the MCC methodology and undermines the integrity of the investigation process.

[1] Joint application with the Steel Reinforcement Institute of Australia (**SRIA**)
[2] EPR 692/032
[3] EPR 692/033

1. Proposed changes are prompted by exporter-specific dumping margin outcomes

Both exporters have alluded to less advantageous dumping margin outcomes in the absence of their proposed changes being adopted:

> [Kamen:] *Failure to adopt the proposed Product Type category would distort dumping margin calculations*[4]
>
> [DMW:] *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*[5]

The Malaysian exporters have clearly performed the dumping margin calculations prior to or during their verification visits and confirmed that their exports to Australia were at dumped prices. Their proposals to differentiate "Project Mesh/cut-to-size mesh" and mine mesh (by "wire finish") as separate models is obviously designed to carve out a proportion of sales from their exporter-specific dumping margin calculations for a more favourable or *de minimis* dumping margin outcome.

If the Commission were to grant these late-stage exporter-specific MCC changes, it undermines procedural consistency and sets an inequitable precedent for future investigations. An approach where certain exporters have an advantage over others is incompatible with the Commission's obligation to ensure equal treatment of all cooperating parties.

2. Applying the proposed MCC changes to these exporters only, would be unfair to others

None of the other cooperating exporters, who provided their responses to exporter questionnaire with sales coded to the existing MCC categories, will have the opportunity to carve out their high value sales through these or other "special" new categories unless they are also subject to a verification visit. As Kamen's submission notes with reference to the Commission's *Dumping and Subsidy Manual*, *MCC structures **may** be modified 'based on the facts and evidence pertaining to a particular exporter'*[6]. The provision that MCC structures may be modified does not mean that all proposed changes must be accepted.

InfraBuild reiterates its earlier view that MCC changes proposed by exporters at verification should only be considered under exceptional circumstances where the price comparability

[4] EPR 692/032, p. 2.
[5] EPR 692/033, p. 2.
[6] EPR 692/032, p.3.

relating to a particular physical 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. InfraBuild notes that the other cooperating mesh-producing exporters in China and Malaysia are highly likely to also produce cut-to-size mesh, mesh for use in projects, fencing mesh, mine mesh etc.

In the interest of fair treatment, does the Commission intend to afford all cooperating exporters (and Australian industry) the opportunity to revise their domestic and export sales data and provide a revised MCC listing? Furthermore, is it the Commission's intention to again verify Australian industry and exporters, previously verified, to ensure that the facts and evidence required in support of the reclassification of the sales items to new categories is justified, relevant and accurate?

Failing to do so would result in a fundamentally unfair and flawed process, as it would allow certain exporters to benefit from late-stage reclassification while others remain bound by the original MCC structure. This will only serve to distort the commission's assessment of exporters.

3. Lack of Justification for proposed MCCs

3.1 Kamen

Kamen seeks to differentiate *'standard welded steel mesh'* and *'Project mesh / cut-to-size ("CTS") products'* through a new MCC category.

InfraBuild reiterates its view[7] that the existing MCC structure already includes the physical characteristic of "Sheet size" to acknowledge the additional processing and higher selling prices associated with "non-standard" sized mesh sheets, whether produced for a "project" application or not. If anti-dumping measures are applied in this investigation, they will relate to clearly defined products and specific physical product characteristics (such as sheet size), not to the commercial terms under which they are sold (for a project). Differentiation on the basis of non-physical characteristics, such as market segments or commercial terms are not intended to be covered by the Commission's policy on the use of MCC protocols, specifically, the *Dumping and Subsidy Manual* prescribes:

[7] EPR 692/029, p. 3.

> 'the Commission **will have regard to differences in physical characteristics** that give rise to distinguishable and material differences in price.'[8] [**emphasis** added]

Another cooperative Malaysian exporter, Southern Steel Mesh, confirmed the mesh sheet size impacts on price in their response to exporter questionnaire:

> '*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*'[9].

If the verification team assessed domestic sales models for Kamen coded to the existing MCC structure, price comparability as affected by 'standard' or 'cut-to-size' mesh sheet dimensions (as appropriately addressed by the MCC physical property category of mesh 'sheet size') would likely be apparent. The additional category proposed by Kamen is superfluous and should not be applied for this exporter alone.

3.2 DMW

DMW has proposed an additional category of "wire finish" with two sub-categories:

"S" – smooth wire with flush cut ends; and
"R" – deformed (ribbed) wire, with or without flush cut ends

The stated objective for proposing this category is '*to ensure that mine mesh is not compared with reinforcing mesh in the calculation of dumping margins*'[10].

In support of their intention to separate mine mesh from reinforcing mesh, DMW refer to the Australian/New Zealand Standard applicable to 'Steel for the reinforcement of concrete', namely AS/NZS 4671:2019, and state:

> '*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*'.[11] [**emphasis** added]

This statement is incorrect. AS/NZS 4671:2019 clearly designates multiple surface profiles for welded mesh use in the reinforcement of concrete. Extract in relevant part is provided below:

[8] Anti-dumping Commission (December 2021), *Dumping and Subsidy Manual*, Department of Industry, Science, Energy and Resources, p. 48.
[9] EPR 692/012, p. 28.
[10] EPR 692/033, p. 2.
[11] EPR 692/033, p. 2.

> *5.4 Designation of welded mesh*
>
> *Welded mesh shall be designated by distinguishing letters or numbers in the following manner:*
>
> *(a) Profile – By the letters, R, D, or I, representing **plain Round**, Deformed ribbed, or deformed Indented, surfaces respectively.*[12]

The "deemed-to-satisfy" provisions contained in the Standard further specifically endorse that when steel mesh members are securely joined together by a cross-weld, the weld itself provides enough grip/hold within the concrete. Ribs or surface indentations are not required to prevent it from slipping.

> *7.5.9 Deemed-to-satisfy rib or indentation geometry*
>
> *Where anchorage is to be provided by the cross-weld, the requirements for rib or indentation geometry shall be deemed to be satisfied.*[13]

While indentations or ribs on the surface of the mesh members may assist to promote adherence of the mesh to the concrete, the welded cross-joints are the critical feature that provides the structural integrity required to provide load distribution and prevent cracking in the concrete. For this reason, welded mesh sheets for concrete reinforcement, depending on the application, may be made from members with smooth or deformed/indented surface profiles.

Chinese mesh producer, Heyou Wire Mesh, manufacturing to AS/NZS 4671:2019 for export to Australia, clearly offers both 'Ribbed and Plain Steel Wire Reinforcement Mesh':

> *Concrete reinforcement mesh is available in two main types:*
>
> ***Ribbed Concrete Reinforcement Mesh**: The wires have three-faced indentations (refer to the figure below), enhancing the bonding with concrete to prevent cracks.*
> ***Plain Steel Wire Concrete Reinforcement Mesh**: Smooth surface wires, suitable for specific applications requiring less friction.*[14]

Some of the current reinforcing mesh range produced by InfraBuild feature a combination of indented or ribbed members and plain round members (specifically trench mesh and square mesh).

[12] AS/NZS 4671:2019 *Steel for the reinforcement of concrete*, p. 7.
[13] AS/NZS 4671:2019, p. 17.
[14] https://www.reinforcedsteelmesh.com/australian-new-zealand-standard/concrete-reinforcement-mesh.html (accessed 22 June 2026)

With respect to the presence (or not) of "flush cut ends", this may also be a requirement for certain reinforcing applications requiring mesh to be cut-to-size with price impacts already considered in the "sheet size" MCC category.

Furthermore, DMW's suggestion that '*the Applicant's claim of material injury primarily concerns the production and sale of reinforcing mesh*'[15] is flawed, with evidence of injury relating to the full range of mesh produced by Australian industry presented at verification.

Conclusion

The Commission should reject the late calls from the Malaysian exporters for modification of the MCC categories applied, equally and fairly, throughout this investigation. To permit this request will serve to distort the commission's assessment of exporters.

Differentiation on the basis of non-physical characteristics, such as market segments or commercial terms are not intended to be covered by the Commission's policy on the use of MCC protocols.

The amendments proposed by both Malaysian exporters are already captured by the existing MCC structure under the "sheet size" category.

To the extent that one Malaysian exporter asserts that "plain" wires are not available to "reinforcing mesh" products is incorrect under the AS/NZS 4671:2019 Standard, which clearly designates multiple surface profiles for welded mesh use in the reinforcement of concrete, including plain members.

The suggestion that the Australian industry's concerns are limited to "reinforcing mesh" products is also misguided and contradicts the evidence presented to the Commission on the question of material injury and causation.

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

FOR AND ON BEHALF OF THE

AUSTRALIAN INDUSTRY APPLICANT

[15] EPR 692/033, p. 4.