

Submission in Response to Statement of Essential Facts Investigation 679 – Light Gauge Steel Stud and Track

Dear Commissioner,

Proposed Ground: The Commission's application of the Lesser Duty Rule (LDR) is not supported by current Australian market pricing evidence. Hume Plasterboard Pty Ltd, as one of the only participants to Investigation 679, with substantiating documents showcasing materially low light gauge steel stud and track pricing offered by competing businesses in the Australian market is the root cause of why this case was initially raised by Rondo.

Hume agrees that anti-dumping duties should apply although Hume seeks to have a lower proposed rate compared to all other businesses who did not participate in this Investigation. Other businesses did not participate because the prices they currently sell at are not only at very low prices but many of them will be very difficult to pinpoint through obtaining formal tax invoices as the majority of times this does not exist.

The 'shadow economy' these "other businesses" operate in through cash only sales and purchases not reported to the Australian Government, creates a suite of problems for evading tax, worsens the issue that compliant Australian businesses suffer from as a result of these "other businesses" actions.

Please keep these invoices confidential as it may contain customer information were obtained in confidence. Some periods may not fall into the investigation period but demonstrates that even at today's increased 2026 prices, Hume's pricing is nearly 15% more expensive than what these non-compliant "other businesses" are selling for, so 2025 prices would on assumption have a greater impact of difference.

1. Introduction

This submission is made in response to the Statement of Essential Facts (SEF) dated 17 June 2026. It addresses the Commission's preliminary application of the Lesser Duty Rule (LDR). The Commission has proposed an effective interim dumping duty of 37.8% for Kaize based on its assessment of the Non-Injurious Price (NIP).

2. Current Australian Market Evidence

The submitting party has obtained current Australian market invoices for comparable light gauge steel stud and track products. These invoices will now be provided to the Commission and as mentioned, these are to kept confidential.

The invoice evidence demonstrates that comparable products are currently being sold within the Australian market at prices ranging up to 13% difference below Hume's prevailing selling prices.

3. Implications for the Lesser Duty Rule

The purpose of the Lesser Duty Rule is to impose only the minimum duty necessary to remove material injury caused by dumped imports. It is not intended to provide domestic producers with prices above competitive market levels.

The invoice evidence indicates that Hume's selling prices are already materially above prevailing market prices. If comparable products are being supplied in Australia at prices up to 13% below Hume's prices, the Commission's proposed NIP appears to exceed the price necessary to remedy any injury attributable to dumping.

Accordingly, the proposed duty risks providing a competitive pricing advantage to the non-compliant business's that directly compete with Hume rather than restoring fair competition to the Australian local market as a whole.

4. Causation

The invoice evidence also raises questions regarding causation. Where comparable products are available from the market at materially lower prices, the Commission should carefully distinguish any injury caused by dumped imports from injury arising from broader competitive market conditions, pricing strategies or other commercial factors.

5. Request

The submitting party, Hume, respectfully requests that the Commissioner:

- Consider the attached invoice evidence before making a final recommendation;
- Reassess the Non-Injurious Price using actual market pricing;
- Reconsider whether the proposed Lesser Duty Rule outcome is appropriate; and
- Amend the proposed measures where necessary to ensure they do not exceed the level required to remedy any injury caused by dumping;
- In summary, to provide a lesser duty to Hume as not only a participant but also a leading source of information to the entire investigation providing as much insight and detailed information as possible to assist the Commissioner with understanding the facts of the industry. Hume therefore anticipates that the additional evidence will allow the Commissioner to amend Hume's anti-dumping duties as initially proposed.

This submission is intended to supplement the evidence already on the Electronic Public Record and should be read together with the supporting invoices.

Thank you for your consideration of the matter and we hope to receive a favourable final determination of Case 679 for Hume Plasterboard Pty Ltd.

Regards,

Hume Plasterboard Pty Ltd



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