

14 July 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 RESPONSE TO CROFT STEEL'S SUBMISSION

InfraBuild (Newcastle) Pty Ltd (**InfraBuild Mesh**) refers to the submission of the importer, CS Traders Pty Ltd (**Croft Steel**),¹ in which several claims were made concerning the impact of Whyalla Steelworks disruptions on InfraBuild Mesh's production of the like goods, and alleged imports of like goods by InfraBuild Mesh.

In summary, Croft Steel seeks to link the Whyalla Steelworks disruptions with potential downstream shortages of reinforcing mesh, by claiming that *...Infrabuild/ARC is purchasing and importing substantial quantities of not only billets... and [in relevant part] ...reinforcing mesh... and doing so ...from these Chinese and/or Malaysian reinforcing mesh manufacturers.*

¹ EPR 692/037.



False claims of imported reinforcing mesh

At the outset, InfraBuild Mesh rejects the allegation that it has directly or indirectly purchased any imported reinforcing mesh from any source, including those the subject of this investigation.

InfraBuild Mesh does not comment publicly on the purchasing decisions of its customers, including those related through common ownership, suffice it to say, that such customers engage in arms length transactions with InfraBuild Mesh driven by competitive and market forces. Indeed, this was the conclusion of the Anti-Dumping Commission in its Australian industry verification report.²

Resilience of InfraBuild Mesh's supply chains

InfraBuild Mesh relies on a decentralised billet supply strategy to produce rod for mesh; the feed material for welded steel mesh. Therefore, although the recent disruptions experienced by the Whyalla Steelworks are regrettable, and potentially disruptive in the short term, they do not pose an ongoing risk to InfraBuild Mesh's supply of the like goods.

It is worth noting that, the Whyalla Steelworks blast furnace suspended operation in early April 2026. This is outside the investigation period (12-months ending 30 September 2025), and as such may not be considered in any non-attribution analysis under subsection 269TAE(2A).³ Specifically, analysis of other factors where they have not been operating at the same time as the dumped imports may not be assessed.⁴

In terms of the ongoing impact of the Whyalla Steelworks billet supply disruption, InfraBuild Mesh initiated its supply continuity contingency plans on [REDACTED] [date], when it became apparent that there was a billet supply issue. Specifically, the key features of this plan are designed to support ongoing production stability of the like goods by implementing the following strategies:

- no immediate impact on customer deliveries of the like goods [REDACTED]
[REDACTED] [operational disclosure];
- [REDACTED] [volume] supply availability of the like goods [REDACTED] [dates];
- initial receipts of [REDACTED] [operational disclosure];
- Initial receipts of [REDACTED] [operational disclosure];
- Return to supply stability for the like goods in [REDACTED] [date];
- Alternative billet and rod for mesh supplies secured for delivery [REDACTED] [dates].

Therefore, as can be observed, InfraBuild Mesh does not anticipate any ongoing impact on supply of the like goods from the Whyalla Steelworks billet supply disruption beyond [REDACTED] [dates]. In terms of the

² EPR 692/019 at p. 6 and [5.1].

³ Legislative references are to the *Customs Act 1901*, unless otherwise specified.

⁴ Anti-Dumping Commission, *Dumping and Subsidy Manual*, Department of Industry, Science, Energy & Resources, Canberra, December 2021, p. 102.



commission's consideration of the requirements to publish a notice under subsection 269TG(2), the causal link to the goods that may be exported in the future at dumped prices continues to exist beyond the immediate, short-term disruption.

Conclusions

Contrary to the claims of Croft Steel, InfraBuild Mesh has not imported, either directly or indirectly, the goods or like goods from subject (or other) sources.

The Whyalla Steelworks billet supply outage has caused a short-term disruption to InfraBuild Mesh's material supply chain, however, contingency plans have been activated, and any supply constraints for the like goods have been limited.

The billet supply outages did not occur during the investigation period, and cannot break the causal link between the dumped goods and injury in any evidentiary sense. The impact of the billet supply shortfall on InfraBuild Mesh will be confined, and does not detract from the causal link between future exports of the goods at dumped prices and the injury being suffered by the Australian industry in the absence of measures.

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

FOR AND ON BEHALF OF THE

InfraBuild (Newcastle) Pty Ltd

AUSTRALIAN INDUSTRY APPLICANT