Australian Government
Department of Industry, Science and Resources
Anti-Dumping Commission

Investigation No. 692

Certain welded steel mesh sheets

Exported from the People's Republic of China and Malaysia.

Comparative variable factors assessment

Anhui BRC & Ma Steel Weldmesh Co., Ltd.

At the time of preparing this assessment, the Anti-Dumping Commission (commission) was unable to calculate a dumping margin for Anhui BRC & Ma Steel Weldmesh Co., Ltd. (Anhui BRC).

The commission's approach to the normal value will be addressed in the *Statement of Essential Facts (SEF) 692* due to be published on 14 August 2026.

Table 1 is the commission's assessment based on the information currently available and may not reflect the final position of the commission.

Export Price	Normal Value	Dumping Margin
Section 269TAB(1)(a)[1]	Refer to chapter 3	To be determined

Table 1: Summary of preliminary variable factors for Anhui BRC

The commission determined that no onsite or virtual verification would be conducted for Anhui BRC. This decision was based on the fact that 2 similar Chinese companies, with comparable market conditions, Beijing Xingtai Steel Weldmesh & Technology Development Co., Ltd. and Tianjin Tiankang Metal Products Co., Ltd, are already subject to verification under Investigation 692 for exports of goods during the same investigation period. This is considered reasonable in the circumstances that the goods the subject of this investigation share a high degree of commonality with respect to key production processes and the supply chain arrangements identified in relation to Anhui BRC's sales into the domestic market in China and the Australian market.

The commission has therefore assessed Anhui BRC by having regard to its response to the exporter questionnaire (REQ) and questionnaires received by other exporters cooperating with the investigation.

In support of the analysis and findings detailed in this report, the commission has prepared the comparative analysis work program at **Confidential Attachment 1**.

[1] All legislative references are to the Customs Act 1901 (Cth) (the Act).

1 Response to the exporter questionnaire

Anhui BRC's response was received within the legislated period and contained relevant information regarding the following:

- its role in the export of the goods to Australia
- sales of like goods made to export and domestic markets
- the cost of production of like goods, including selling, general and administrative expenses (SG&A).

Anhui BRC is considered a cooperative exporter.

The public version of Anhui BRC's REQ is available on the electronic public record (EPR) for this case on the Commission's website at www.adcommission.gov.au.[2]

1.1 Summary of material revisions

The following assessment details revisions performed on the data supplied in the exporter's REQ.

Material revision 1: Domestic sales – Revise the domestic sales listing

Description: The commission noted that, in the domestic sales listing, multiple customers were recorded under a single invoice number.

Resolution: The exporter confirmed it as an error and revised the domestic sales listing.

Material revision 2: Domestic sales – Revise the domestic sales listing

Description: The commission identified a number of domestic sales transactions with unit invoice values outside the expected price range.

Resolution: The exporter explained that the values outside the average mesh price related to other services provided to the same customer, as the domestic sales listing included transactions beyond the GUC. The commission excluded these transactions from the domestic sales listing for the calculations.

Material revision 3: Invoice date as date of sale

Description: The commission noted that, in the REQ response, the exporter reported a date other than the invoice date or order date as date of sale in the domestic sales listing. Upon clarification, the exporter advised that the delivery date recorded in the domestic sales listing was used as the date of sale.

Resolution: The commission determined that the invoice date is more appropriate as the date of sale and has updated the domestic sales listing to show the invoice date as the date of sale.

2 Export price

For the purpose of this assessment, the commission proposes to determine an export price for Anhui BRC under section 269TAB(1)(a) of the *Customs Act 1901* (the Act).

The commission has calculated an export price of the goods exported by Anhui BRC to Australia from China under section 269TAB(1)(a). The export price was calculated as the

[2] EPR 692 – document 016.

price paid by the importer to the exporter for the goods, less any charges or expenses in respect of the transport of the goods after exportation.

2.1 Who is the exporter?

The commission considers Anhui BRC is the exporter of the Australian export goods because this company:

- produced the Australian export goods
- is named as the supplier on commercial invoices
- is named as consignor on bills of lading
- arranged and paid for inland transport to the port of export
- arranged and paid for port handling charges at the port of export

2.2 Who is the importer?

For all transactions, the commission considers Anhui BRC's Australian customers are the importers of the Australian export goods.

For each transaction, Anhui BRC's Australian customer:

- is named as the consignee on bills of lading
- is named as the importer on import declarations to Australian Border Force (ABF)

2.3 Were the Australian export sales sold at arm's length?

2.3.1 Unrelated customers

For all unrelated customer transactions, the commission finds that Anhui BRC sold the Australian export goods **at arm's length** as defined under section 269TAA.

For these transactions, the commission does not find that:

- there was consideration for the goods other than price
- a relationship between a buyer, a seller or their associates appeared to influence the price
- a buyer or buyer's associate directly or indirectly received compensation, reimbursement or another benefit for, or relating to, any part of the price.

For these transactions, the commission notes that Anhui BRC:

- sold goods at similar prices to all unrelated customers
- sold goods at similar prices to other sellers in the Australian market
- appeared to genuinely negotiate the price with unrelated customers

2.3.2 Related customers

The commission finds that Anhui BRC did not sell the export goods to related customers in Australia.

3 Normal value

The commission has considered a number of matters relevant to the determination of normal value. However, the commission has not undertaken an examination of all aspects of the exporter's normal value calculation.

At this stage of the investigation, the commission is considering a claim that a particular market situation exists in China, as asserted in the application. This claim raises the possibility that Anhui BRC's domestic sales may not be suitable for the purpose of determining normal value under subsection 269TAC(1).

The commission has not, at this stage, formed a view as to whether the particular market situation claim in respect of the Chinese domestic market for the goods under consideration should be accepted or rejected. The commission's assessment of this claim, as well as the basis for its determination of normal value, will be set out in detail in the SEF.

3.1 Did the exporter produce and sell like goods for the domestic market?

The commission finds that, during the investigation period, Anhui BRC produced and sold like goods for domestic home consumption.

The commission finds that these goods were 'like goods' because these domestic goods are identical to, or closely resemble, the Australian export goods. The commission has described its reasons below.

3.1.1 Physical likeness

Anhui BRC does not distinguish between domestic like goods and the Australian export goods based on physical characteristics. The commission notes however that Anhui BRC sold a different range of goods to the domestic market compared to the Australian market.

3.1.2 Production likeness

Anhui BRC produced goods at the same facilities, using the same types of raw material inputs and production processes.

3.1.3 Commercial likeness

All goods compete in the same market sectors, can be interchangeable and use similar distribution channels.

3.1.4 Functional likeness

All goods are functionally alike, as they have similar end uses.

3.2 Were the domestic sales sold at arms length?

Anhui BRC confirmed that all sales of the goods in the domestic market was made to non-related customers.

On this basis, the commission considers it reasonable to conclude that Anhui BRC's domestic sales of the goods to customers were conducted at arms length, as defined under section 269TAA of the Act.

3.3 Do the accounting records comply with generally accepted accounting principles?

The commission finds that Anhui BRC's accounting records for the investigation period comply with the generally accepted accounting principles of China. This is based on the auditor's opinion contained in the financial statements for the 2024 financial year which concluded Anhui BRC's financial accounts comply with the Chinese accounting standards.

3.4 Did the production records reasonably reflect competitive market costs?

In considering the claim of a particular market situation, the commission has examined issues relating to the pricing of raw material inputs used in the manufacture of the goods under consideration. The claim asserts that raw material prices in China do not reasonably reflect competitive market costs.

Where the criteria set out in regulation 43(2) are not satisfied, the Minister is neither required to, nor precluded from, relying on an exporter's records for the purposes of section 269TAC.

The commission has collected information relating to raw materials and their procurement. This information will be considered in assessing the claim that the exporter's cost records do not reasonably reflect competitive market costs.

At this stage, this report does not reach a concluded view as to whether the exporter's production records reasonably reflect competitive market costs, having regard to the ongoing consideration of the particular market situation claim. The commission's assessment of the exporter's production records, including its evaluation of the relevant cost information, will be set out in detail in the SEF.

3.5 Related party suppliers

No related party suppliers were identified for the purchases of raw materials used in the production of the goods under consideration.

3.6 Were domestic sales in the ordinary course of trade?

This report has not assessed if domestic sales were in the ordinary course of trade on account of the investigation involving a claim of particular market situation. The commission's consideration of this claim and the determination of normal value will be fully detailed in the SEF.

3.7 Is there a low volume of relevant domestic sales?

This report has not assessed the volume of relevant domestic sales on account of the investigation involving a claim of particular market situation. The commission's consideration of this claim and the determination of normal value will be fully detailed in the SEF.

3.8 Domestic sales volumes for each model

This report has not assessed the sales volume of relevant domestic models on account of the investigation involving a claim of particular market situation. The commission's consideration of this claim and the determination of normal value will be fully detailed in the SEF.

3.9 Adjustments to compare export price and normal value

This report has not examined adjustments relevant to the comparison of export price and normal value on account of the investigation involving a claim of particular market situation. The commission's consideration of this claim and the determination of normal value will be fully detailed in the SEF.

4 Appendices and attachments

Confidential Attachment 1	Comparative analysis work program
Confidential Appendix 1	692 - Anhui BRC - Appendix 1 – Export Price
Confidential Appendix 2	692 - Anhui BRC - Appendix 2 – CTMS
Confidential Appendix 3	692 - Anhui BRC - Appendix 3 – Normal Value