7 August 2026

The Director - Investigations 3
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

EMAIL: investigations3@adcommission.gov.au

Dear Director,

Accelerated Review No. 708 - Steel reinforcing bar (rebar) from Indonesia

The member of the Australian industry producing like goods to the goods the subject of this accelerated review, *InfraBuild (Newcastle) Pty Ltd* (**InfraBuild**), refers to the response to Exporter Questionnaire (REQ) by Indonesian rebar producer *PT The Master Steel Manufacturing* (**Master Steel**). InfraBuild makes the following comments and raises the questions below in relation to responses contained. Section references cited are consistent with the questionnaire.

1. Completeness of domestic costs and sales and testing of arms length sales

Master Steel has rebar production facilities in Jakarta and Surabaya [A-1.5]

Question: Have all costs-to-make been captured across all facilities in Jakarta and Surabaya?

Question: Have all domestic sales been captured from all facilities in Jakarta and Surabaya?

Master Steel have disclosed a subsidiary, PT Master Manunggal Fabrikasi, which *…operates as a rebar fabrication company* [A-2.5]. They have also claimed that in the Indonesian market …*all users and traders are unrelated party…* [J-1.3] and that …*prices are same to all customers including related entities* [J-3.15].

Question: This subsidiary is based in Jakarta, have sales of rebar to this entity (for further fabrication and processing) been included in the domestic sales listing?

Question: Have sales to this subsidiary been tested for arms length?

2. Appropriate Model Control Codes for Normal Value calculations

InfraBuild reiterates the view expressed in its recent submission[1], that **sales of Grade BjTS 520 alone should form the basis of the normal value for Master Steel**.

It is unclear from the domestic sales MCC table provided by Master Steel in their REQ, which grades they have categorised as 'B' or 'C'. We again note that based on the mechanical properties in the Indonesian rebar Standard, that the most comparable Indonesian domestic grade to the future export grade to Australia, namely Grade 500N, is **Grade BjTS 520** as both of these grades, having a minimum yield strength of 500MPa and 520MPa respectively, would be classified as subcategory 'C' in the MCCs.

Item	Category	Sub-category	Identifier
1	Prime	Prime	P
		Non-Prime	N
2	Minimum yield strength specified by product standard (Mega Pascals or "MPa")	Less than or equal to 300	A
		Greater than 300 but less than or equal to 480	B
		Greater than 480 but less than 550	C
		Equal to or greater than 550	D

InfraBuild strongly opposes any normal value ascertained for Master Steel based on domestic sales of grade BjTP 280, BjTS 280 or BjTS 420 (A or B). The most alike domestic grade for comparison to the future export grade and future dumping margin calculations is <u>**BjTS 520**</u>.

<u>**Question:**</u> Has grade BjTS 520 been correctly classified as MCC subcategory 'C' and grade BjTS 420A/420B as MCC subcategory 'B' for <u>minimum</u> yield strength specified by product Standard?

3. Claims on sales prices and practices

Master Steel have indicated that domestic sales channels in Indonesia for rebar are mainly direct sales (80%) with the balance via traders/distributors. [J-1.1(h)] Despite this, Master Steel claims with regard to its own domestic sales:

- *…We are the price maker in the country…* [J-3.3]
- Prices to related domestic customers are set at …*prevailing current market prices*… [D-1.2]

[1] EPR708/004 InfraBuild submission dated 5 August 2026

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- Prices do not vary by distribution channel and …*there are no distinct differences in the prices for different customers*...[D-1.4]
- Price negotiations are concluded on a …*day-to-day basis*… and …***no price list is published*** [D-1.3]. Master Steel then directs the Commission to …***refer to folder "Price List"***… [J-3.12] for the goods sold in the domestic market during the review period.
- No discounts or rebates are offered. [J-3.8]

Request: InfraBuild requests that the Commission test the arms length nature of domestic sales to all related parties (not solely their related distributor) and further test the veracity of the claims around rebar pricing mechanisms in the domestic market.

4. Ex-Works to FOB Adjustment Factors

Master Steel has noted that despite no exports of rebar to Australia or elsewhere, it does export Wire Rod to various destinations including Australia. Costs incurred for exports of wire rod from their Jakarta and Surabaya facilities provide a basis to make an adjustment under subsection 269TAC(8) for inland freight of future rebar shipments from the EXW point to FOB.

5. Raw Materials – Billet

Master Steel has advised that some billet is purchased for use in the production of rebar. Billet for 'debar' (presumably deformed bar) is identified by the specification and that a different specification is used for wire rod.

Question: Has the correct billet cost been applied for the grades relevant to rebar production?

FOR AND ON BEHALF OF

THE AUSTRALIAN INDUSTRY
InfraBuild Steel

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