

8 September 2026

The Director – Investigations 1
Anti-Dumping Commission
GPO Box 2013
Canberra



By email: Investigations1@adcommission.gov.au

**RE: Investigation No. 692 – Certain Welded Steel Mesh Sheets from China
SRIA Response to joint submission by Beijing Xingtai and TKM**

Dear Director

The Steel Reinforcement Institute of Australia (**SRIA**), representing Australian manufacturers of the goods, is a joint industry applicant in this matter. The SRIA welcomes the recent publication of the preliminary affirmative determination (**PAD**) and imposition of securities on Chinese mesh and looks forward to the publication of the Malaysian exporter visit reports.

We take this opportunity to respond to the submission lodged on behalf of the Chinese mesh exporters Beijing Xingtai Steel Weldmesh & Technology Development (**Beijing Xingtai**) and Tianjin TianKang Metal Product (**TKM**) following publication of the PAD.

Section 1.4 of the PAD published on 7 August 2026 records that the Commission undertook verification and consultation with Australian industry, relying on evidence from InfraBuild and the following SRIA members who supported the application:

- InfraBuild
- BestBar Pty Ltd
- Mesh & Bar Pty Ltd
- Neumann Steel Pty Ltd
- Vic Mesh Pty Ltd
- Wire Industries Pty Ltd
- Bianco Reinforcing Pty Ltd

At **Section 1.8.2**, *Australian industry producing like goods – preliminary assessment*, the Commissioner stated:

As a result of the information verified during the verification visit to InfraBuild, and obtained through consultation with SRIA members, I am satisfied that there is an Australian industry comprised of InfraBuild and supporting SRIA members (including BestBar, Mesh & Bar, Neumann Steel, Vic Mesh, Bianco Reinforcing and Wire Industries) producing like goods to the goods the subject of the application and that like goods are produced in Australia.

This preliminary assessment confirms that the Commission has verified production, that is, the full and substantial process of manufacture of welded steel mesh sheets in Australia.

The SRIA has reviewed the recent submission lodged on behalf of the Chinese exporters in response to the PAD. The central claim made in that submission is that the Commission has not properly determined whether SRIA member companies perform a ...*substantial process in the*

manufacture... of welded steel mesh sheets in Australia, as required by subsection 269T(3) of the Customs Act.

The submission argues that the PAD merely asserts that SRIA members undertake *...at least one substantial process...* without identifying those processes. While the PAD does not list each process for each SRIA member individually, the Commission's verification and consultations confirmed the full production chain from rod in coil (**RIC**) to mesh including cold-drawing, ribbing, straightening, welding and the manufacture of finished mesh. This is in line with the Chinese exporters' own understanding of the SRIA members' production process expressed in their submissions in *Anti-circumvention Inquiry No. 643*:

TKM (and Beijing Xingtai) understands that Infrabuild sells RIC to numerous Australian manufacturers that process into cold drawn wire. Those manufacturers then further process the cold drawn wire into reinforcing mesh sheets. [EPR 643: Submissions 4 and 5, pp. 1-2]

As the peak industry body, SRIA has deep knowledge of Australian manufacturing capability. SRIA delivers annual lectures to all Australian universities and regular professional engineering seminars covering domestic mesh production processes. SRIA mesh-manufacturing members cold-draw RIC, rib, straighten and weld to produce welded mesh, and the Commission has verified these processes onsite.

The Chinese exporters' submission repeatedly asserts that SRIA members do not draw or rib wire, only cut and weld purchased ribbed wire, and therefore perform only simple assembly steps. This is factually incorrect. Accordingly, the core premise of the Chinese exporters' submission is incorrect. SRIA members do undertake substantial processes of manufacture in welded mesh sheet production in Australia, and the Commission's verified evidence directly contradicts the claims made in their submission.

To put this issue beyond doubt, the SRIA has had regard to the factors the Commission may consider relevant for the purpose of determining whether goods have been 'slightly modified'¹ and considers a number of these factors in the context of the raw materials that may be used for mesh production:

- Each good's general physical characteristics
 - o Whether starting from rod, wire, galvanised wire or rebar, the finished welded mesh sheets have different general physical characteristics to the raw materials used, i.e. lengths of media are transformed to a welded matrix sheet.
- Each good's end use and their interchangeability
 - o The input raw material, being rod, wire, galvanised wire or rebar, cannot be used in the same end-use application as a welded mesh sheet and vice versa.
- Differences in the processes and costs to produce each good
 - o The manufacture of welded mesh sheets requires operation (and associated costs) of a mesh machine that is not required in the production of the input raw materials.
- Customer preferences, expectations and marketing of the goods
 - o Welded mesh sheets have a different end-use application to the raw materials used to produce them and the product is marketed and sold accordingly.
- Tariff classifications and statistical codes for each good
 - o Rod, wire, rebar and mesh all have different tariff classifications and statistical codes.

¹ Under subsection 48(3) of the *Customs (International Obligations) Regulation 2015*

Irrespective of the input raw material used to make the welded steel mesh sheets, whether rod in coils, wire, galvanised wire or rebar in lengths or in coils, consideration of the above factors all support the view that the process of transforming these raw materials into a welded mesh sheet involves a substantial process of manufacture rather than a slight modification.

In conclusion, the SRIA submits that the Chinese exporters' arguments are based on an incorrect understanding of the manufacturing activities undertaken by SRIA members. The Commission has verified that SRIA members produce welded steel mesh sheets in Australia through substantial manufacturing processes. Accordingly, the evidence supports the Commissioner's preliminary finding that SRIA members form part of the Australian industry producing like goods, and the exporters' submission should be rejected.

Yours Sincerely

Scott Munter
CEO/Executive Director
Steel Reinforcement Institute of Australia