PUBLIC RECORD

Australian Government
Department of Industry, Science and Resources

Anti-Dumping Commission

Importer verification report

Verification and case details

Initiation date	25/11/2025	**ADN**	2025/114
Case number	692		
The goods under consideration	Certain Welded Steel Mesh Sheets		
Case type	Dumping Investigation		
Importer	Jennmar Australia Pty Limited		
Location	40–44 Anzac Avenue, Smeaton Grange NSW 2567		
Verification date	26/05/2026		
Investigation period	1/10/2024	to	30/09/2025

The Anti-Dumping Commission will review this report, including its views and recommendations.

This report may not reflect the Anti-Dumping Commission's final position.

Contents

Introduction

The Anti-Dumping Commission (the commission) issued a questionnaire that sought importer data and information for Dumping Investigation 692 (case 692) into Certain Welded Steel Mesh Sheets from the People's Republic of China (China) and Malaysia during the investigation period.

The goods under consideration - Certain Welded Steel Mesh Sheets – are hereafter referred to as 'the goods' or 'mesh'.

Jennmar Australia Pty Limited (Jennmar Australia), an importer of the goods, submitted a questionnaire response on behalf of related party Australian Steel & Wire Pty Ltd (ASW). ASW is no longer trading. Whilst Jennmar Australia is a current importer of the goods they did not import during the investigation period.

The commission met with Jennmar Australia to verify the questionnaire response and assessed the reliability of the information. For the purpose of the verification Jennmar Australia acted for all entities in the group that were involved in the importation and sales of the goods.

A verification team (the team) has verified the data submitted by Jennmar Australia is complete, relevant and accurate for use in case 692. Anti-Dumping Notice (ADN) 2016/30 describes the commission's verification procedure.

This report explains the team's key findings, including evidence considered and material issues identified. Where Jennmar Australia or the team materially revised the submitted data, this report outlines the nature, extent and outcomes of these revisions.

The commission prepared this report to publish on the electronic public record (EPR) for case 692.

A finding made in this verification report (verification finding) and verification recommendations (verification recommendations) are made in the context of this verification only. These verification findings and verification recommendations may be referred to and relied up on in the Statement of Essential Facts and Final Report for case 692.

Verification teams are authorised to conduct verifications under sections 269SMG and 269SMR of the *Customs Act 1901* (Cth) (the Act).[1]

The commission details its processes and findings in the verification work program at **Confidential attachment 1.**

[1] All legal citations in this report are to the Act unless otherwise stated.

1 Company background

1.1 Corporate structure and ownership

ASW imported the goods during the investigation period.

ASW established Dynamic Mesh & Wire Industries Sdn Bhd (DMW) in Malaysia to provide an alternative manufacturing base and increase supply capacity. DMW is a cooperative exporter in case 692.

ASW was fully owned by Australian Steel Investments Pty Ltd, an entity owned by FCI Holdings Australia Pty Ltd.

FCI Holdings Australia Pty Ltd and Jennmar Australia are both owned by Frank Calandra Inc. (United States) and part of the larger Jennmar Group that manufactures and supplies ground support products for the mining and civil sectors globally.

ASW was deregistered on 1 January 2026 following a corporate restructure, with its commercial operations, assets and liabilities transferred to Jennmar Australia.

1.2 Related parties

The commission examined the relationships between the parties involved in the supply and sale of the goods during the investigation period.

1.2.1 Related suppliers

During the investigation period, ASW mainly purchased mesh from its related entity DMW. ASW also purchased smaller quantities of mesh from unrelated suppliers in China and Malaysia.

1.2.2 Related customers

ASW sold the goods to related entity Jennmar Australia during the investigation period.

Jennmar Australia then sold the goods to related and unrelated customers.

The commission reviewed the sales process between ASW and Jennmar Australia and is satisfied that the transactions were not at arm’s length.

2 Goods under consideration

2.1 Importation of the goods under consideration

Jennmar Australia confirmed that ASW imported goods from China and Malaysia during the investigation period matching the description of the goods that are the subject of this investigation.

2.2 Model control codes

The sales and costs data in relation to the ASW sales comply with the model control code (MCC) structure detailed in ADN 2025/114.

2.3 Verification of model control codes

Table 1 below details how the commission determined MCC sub-categories and verified them to source documents.

Category	Sub-category verification method
Prime	All goods sold are prime.
Coating	Based on the coating indicated on the purchase order, commercial invoice and shipping documents.
Highest nominal cross-sectional diameter (millimetres or "mm") of longitudinal members	Based on the diameter indicated on the purchase order, commercial invoice and shipping documents.
Sheet size measured by nominal area (sheet size length x sheet size width in m^2)	Based on the sheet size indicated on the purchase order, commercial invoice and shipping documents.

Table 1 MCC sub-category determination

The commission is satisfied that ASW sold the goods in the Australian market.

2.4 List of model control codes

ASW imported and sold the following MCCs during the period.

Sales MCC	
P-G-A-S	P-G-A-M
P-G-A-L	P-G-A-XL
P-G-B-M	P-N-A-S
P-N-A-M	P-N-A-L
P-N-A-XL	P-N-B-S
P-N-B-XL	

Table 2 List of model control codes

The commission details its processes and findings in the verification work program at **Confidential attachment 1.**

2.5 Like goods assessment

The commission considers that the goods ASW imported for domestic sale had characteristics closely resembling those manufactured by the Australian industry and were therefore ‘like goods’ according to section 269T(1).

3 Verification of sales completeness and relevance

The commission typically verifies sales as complete and relevant by reconciling the revenue and quantity in sales listings up to management accounts and then audited financial accounts. ADN 2016/30 further describes this verification process.

The commission verified whether the ASW's sales listing is complete and relevant by reconciling it to the audited financial statements, consistent with ADN 2016/30.

The commission verified whether the sales data was complete and relevant by:

1. Reconciling the total company revenue for the 30 June 2025 to the audited financial statements of ASW's holding entity ASI.
2. Reconciling the total company revenue for the investigation period to the management accounts of ASI.
3. Ensuring that the goods were correctly classified having regard to product codes and relevant materials.
4. Ensuring that ASW's domestic sales listing only included sales to Australian market by verifying the destinations on invoices.

The commission did not identify any issues. The commission detailed this process in the verification work program and its relevant attachments in **Confidential attachment 1**.

3.1 Sales completeness and relevance finding

The commission is satisfied that the sales data is complete and relevant.

4 Verification of sales accuracy

The commission typically verifies sales as accurate by reconciling a selection of volume, revenue and other key data in the sales listings down to source documents. ADN 2016/30 further describes this verification process.

The commission verified whether ASW's sales listing Jennmar Australia submitted is accurate by reconciling them to source documents, consistent with ADN 2016/30.

The commission identified the issue outlined below. The team detailed this process in the verification work program and its relevant attachments in **Confidential attachment 1**.

4.1 Sales accuracy exceptions

Exception 1: Total sales expressed in tonnes

Description: The ASW Australian sales listing submitted in the importer questionnaire response, expressed quantities in number of sheets only for the sales transactions**.**

Resolution: Jennmar Australia submitted an updated sales listing containing an added column indicating the quantities in metric tonnes.

4.2 Sales accuracy finding

The team is satisfied that the sales data Jennmar Australia submitted (in respect of ASW's sales) is accurate, including any revision outlined in an exception above.

5 Verification of imports and cost to import and sell

5.1 Import listing

Jennmar Australia confirmed that the ASW import listing extracted from the ABF import database is a complete list of imports of the goods over the investigation period.

5.2 Verification of cost to import and sell

Prior to the verification, the commission selected 12 sample ASW shipments for Jennmar Australia to complete the cost to import and sell (CTIS) spreadsheet of the importer questionnaire.

For each of the selected shipments, Jennmar Australia provided the following source documents

- Purchase order
- Commercial invoice
- Packing list
- Bill of Lading
- Sales contract
- Customs brokerage tax invoice
- Ocean freight invoice
- EFT payment
- Australian customs entry

The commission typically verifies cost to import and sell (CTIS) as complete and relevant by reconciling the total cost to import and the selling, general and administrative (SG&A) expenses in cost listings up to management accounts and then audited financial accounts. ADN 2016/30 further describes this verification process.

The team verified whether the CTIS Jennmar Australia submitted are complete and relevant by reconciling it to audited financial statements, consistent with ADN 2016/30.

The team identified the issues outlined below during this process. Details of this verification process are contained in the verification work program and its relevant attachments, at **Confidential attachment 1**.

5.2.1 Exceptions during verification of CTIS

Exception 2: Incomplete supporting documentation for selected shipment

Description: The commission noted, when reconciling data, that supporting data had been provided for some, but not all, selected samples. The commission therefore requested Jennmar Australia to provide the requisite data for the remaining sample consignments.

Resolution: The commission received the missing documents that enabled the commission to calculate the profitability of ASW's sample import shipments during the investigation period.

Exception 3: Misclassification of travel and advertising expenses

Description: The commission identified that the Jennmar Australia had incorrectly categorised ASW's expenses relating to travel and advertising as direct selling costs.

Resolution: The commission explained that these expenses form part of the SG&A and the company agreed to include these expenses to the SG&A listing.

Exception 4: Removal of rates and taxes from the SG&A listing

Description: The commission identified that the ASW SG&A listing included expenses paid for rates and taxes.

Resolution: The commission removed these items as they don't form part of the SG&A.

Exception 5: Warehousing expenses

Description: The commission identified that Jennmar Australia had omitted to provide the ASW warehousing costs in relation to the goods. The commission therefore requested this information.

Resolution: Jennmar Australia provided the costs of warehousing for the various locations, and the commission applied this cost to the unit CTIS.

5.3 CTIS allocation method

Table 3 outlines how the commission allocated each CTIS component.

Cost Area	Method applied
Ocean freight	Not applied as all sales were at CIF or C&F terms of trade.
Marine insurance	Included where the sales were at C&F terms of trade.
Port handling and import charges	Weighted average amount allocated per tonne.
Delivery from the port to the warehouse	Weighted average amount allocated per tonne.
Delivery from the warehouse to the customer	Weighted average amount allocated per tonne.
Warehousing costs	Weighted average amount allocated per tonne.
SG&A	Calculated as percentage of unit selling price

Table 3 CTIS allocation method

5.4 Forward orders

The commission verified Jennmar Australia's forward orders by reconciling the listing provided in the questionnaire response to records contained within the company's internal accounting system. The verified list of forward orders is at **Confidential appendix 1.**

5.5 CTIS verification finding

The commission is satisfied that the CTIS provided, including any required amendments as outlined in the exception description above is accurate.

A table detailing the weighted average unit CTIS is at **Confidential appendix 2.**

6 Supply tenders and contracts

Jennmar Australia provided a presentation on injury and causation. The company asserted that the mine mesh market differs from the reinforcing steel mesh market in terms of customer requirements, contracting arrangements and competitive dynamics. Jennmar Australia submitted that these differences influence how it operates in the mine mesh market, including tender processes, pricing determination, and supply decisions, and are relevant to the assessment of injury and causation.

Jennmar Australia further noted that, although mine mesh falls within the scope of the goods under consideration, it is supplied under sales, pricing and competitive conditions that differ from those applicable to other products covered by the investigation.

6.1 Information provided by Jennmar Australia related to supply tenders and contracts

Jennmar Australia provided sample tender documents and resulting contracts relevant to:

- Conditions of submitting a quotation from customer
- Tender proposal submitted by Jennmar Australia
- Customer feedback on tenders awarded or lost during the investigation period
- Formal agreement between Jennmar Australia and customer when tender awarded
- Price variation formulas to be applied on a 6-month basis.

Evidence relevant to the tender process can be found in **Confidential attachment 2**.

6.2 Importer comments concerning the tender process

Jennmar Australia described tender processes and sales in the mine mesh market as being predominantly conducted under long-term supply agreements or contracts, generally extending for three years. Pricing for the mine mesh is commonly determined through a tender process, with mine mesh frequently supplied as part of a broader ground support package for mining operations. Jennmar Australia presented that pricing for a tender process was generally very competitive, but costs can increase in the duration of the contract. If adjustments are made over the term of an agreement, they are done via formula-based price reviews.

6.3 Claims concerning the applicant

Jennmar Australia submitted that factors other than price may influence customer sourcing decisions in the mine mesh market. Jennmar Australia stated that mining customers place significant importance on service, supply reliability, product availability and the ability to meet site-specific requirements. Jennmar Australia contended that Australian industry, has experienced difficulties in meeting these requirements due to production constraints, supply reliability issues and a focus on reinforcing mesh products.

7 Export price

7.1 The importer

The commission considers ASW to be the beneficial owner of the goods at the time of importation and therefore the importer of the goods, as ASW:

- was named on the commercial invoice from its supplier
- was named as the consignee on the bill of lading
- was declared as the importer on the importation declaration to ABF
- paid for all the importation charges
- arranged delivery from the port.

7.2 The exporter

ASW imported the goods to Australia. Where ASW purchased the goods from DMW the commission considers DMW to be the exporter of the goods,[2] as DMW is:

- the manufacturer of the goods
- named on the commercial invoice and packing lists
- named as consignor on the bill of lading.

7.3 Related party customers

The commission found that sales between ASW and Jennmar Australia were non arms length. Specifically; the parties apply an internal transfer pricing arrangement.

The commission also reviewed ASW's selling process to unrelated customers and found that these sales were conducted at arms length. The commission relied on the selling prices to unrelated customers to calculate profitability.

7.4 Profitability of imports

The commission assessed the profitability for the following selected shipments by comparing the revenue to the CTIS for each shipment. As the commission cannot trace each selected shipment to actual sales transactions, the commission used the quarterly weighted average sales revenue by MCC to assess its profitability.

[2] The commission generally identifies the exporter as a principal in the transaction, located in the country of export from where the goods were shipped, that gave up responsibility by knowingly placing the goods in the hands of a carrier, courier, forwarding company, or its own vehicle for delivery to Australia; or a principal in the transaction, located in the country of export, that owns, or previously owned, the goods but need not be the owner at the time the goods were shipped.

The outcome of this assessment is in Table 4 below.

Shipment	Profitable (Y/N?)
1	N
2	N
3	Y
4	Y
5	N
6	Y
7	Y
8	Y
9	Y
10	Y
11	Y
12	Y
Weighted average all shipments	**Y**

Table 4 Profitability of selected imports

The assessment is at **Confidential Appendix 2**.

7.5 Related party suppliers

ASW purchased a portion of the goods from related party, DMW, during the investigation period. The price paid by ASW to DMW was set by internal price guidance under a transfer pricing arrangement.

7.6 Arms length

In respect of imports of the goods to Australia by ASW during the investigation period, the commission found that.

- the price was influenced by a commercial or other relationship between the buyer, or an associate of the buyer, and the seller, or an associate of the seller; and
- the buyer, or an associate of the buyer, was directly or indirectly, reimbursed, compensated or otherwise received a benefit for, or in respect of, whole or any part of the price.

Therefore, the team is not satisfied that the transactions between ASW and DMW were conducted at arms length.

7.7 Export price assessment

The team is of the opinion that for the goods imported by ASW from DMW:

- the goods have been exported to Australia otherwise than by the importer
- the goods have been purchased by the importer from the exporter
- the purchases of the goods by the importer were not arms length transactions
- the goods are subsequently sold by the importer, in the condition in which they were imported, to a person who is not an associate of the importer.

Subject to further inquiries in relation to these shipments, the team recommends that the export price for certain welded steel mesh sheets imported by ASW from DMW be established under section 269TAB(1)(b) of the Act, being the price at which the goods were sold by the importer less the prescribed deductions.

8 Attachments

Confidential appendix 1	Forward orders
Confidential appendix 2	Profitability of imports
Confidential attachment 1	Verification work program
Confidential attachment 2	Tender process