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

Wei Dat Steel Wire Sdn. Bhd.

Table 1 summarises 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]	Section 269TAC(1)	Negative 29.1%

Table 1: Summary of preliminary variable factors for Wei Dat Steel Wire Sdn. Bhd.

The commission determined that no onsite or virtual verification would be conducted for Wei Dat Steel Wire Sdn. Bhd. (Wei Dat Steel). This decision was based on the fact that 2 similar Malaysian exporters, Kamen Steel Industries Sdn. Bhd. (Kamen Steel) and Dynamic Mesh and Wire Industries Sdn. Bhd. (DMW), are already subject to verification under Investigation 692 for exports of goods during the same investigation period.

This is considered reasonable in the circumstances, given 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 Wei Dat Steel's sales into the domestic market in Malaysia and the Australian market.

The commission has therefore assessed Wei Dat Steel by having regard to its response to the exporter questionnaire (REQ) and questionnaire responses received by other exporters cooperating with the investigation. These include the 2 verified exporters Kamen Steel and DMW, along with cooperative Malaysian exporter Southern Steel Mesh Sdn. Bhd. who provided an REQ but was not verified.

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 Response to the exporter questionnaire

Wei Dat Steel'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

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

- the cost of production of like goods, including selling, general and administrative expenses (SG&A)

Wei Dat Steel is considered a cooperative exporter.

The public version of Wei Dat Steel'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: Revised REQ to exclude non-GUC included in original submission.

Description: On 17 June 2026, Wei Dat Steel informed the commission that it had inadvertently included non-GUC products in its original exporter questionnaire response. **Resolution:** On 3 July 2026, Wei Dat Steel submitted revised sales and costs data that excluded non-GUC products from the submitted data. Supporting documentation was provided.

Material revision 2: Australian and domestic Cost to Make (CTM)

Description: The case team noted that packing costs had not been included in the Australian or domestic sales listing. **Resolution:** Wei Dat Steel revised both Australian and domestic sales listings to include packing costs along with supporting documentation.

Material revision 3: Domestic inland transport cost allocation

Description: The case team identified Ex-Works (EXW) domestic sales transactions that had inland transport costs allocated to them. **Resolution:** The case team reallocated inland transport costs to only domestic sales transactions that included delivery.

2 Export price

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

The commission has calculated an export price for the goods exported by Wei Dat Steel to Australia from Malaysia under section 269TAB(1)(a). The export price was calculated as the 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.

Confidential appendix 1 contains the commission's export price calculations.

[2] EPR 692 – document 016.

2.1 Who is the exporter?

The commission considers Wei Dat Steel 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 Wei Dat Steel's Australian customers are the importers of the Australian export goods.

For each transaction, Wei Dat Steel'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 arms length?

2.3.1 Unrelated customers

For all unrelated customer transactions, the commission finds that Wei Dat Steel sold the Australian export goods **at arms 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 Wei Dat Steel:

- 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 found that Wei Dat Steel did not sell to related customers on the Australian market.

3 Normal value

The commission finds that there is a sufficient sales volume of domestic like goods, sold at arms length and in the ordinary course of trade to set a normal value under section 269TAC(1).

The commission recommends adjusting the normal value to enable a proper comparison with the export price when measuring the level of dumping, under section 269TAC(8).

The commission recommends the following adjustments:

Adjustment description	How to apply an amount for adjustment
Domestic credit terms	Deduct an amount for domestic credit
Domestic inland transport	Deduct an amount for domestic inland transport
Domestic packaging	Deduct an amount for domestic packaging
Export packaging	Add an amount for export packaging
Export inland transport	Add an amount for export inland transport
Export port and handling charges	Add an amount for export port and handling charges
Export credit terms	Add an amount for export credit
Specification adjustment	Add or deduct an amount for specification differences
Timing adjustment	Add or deduct an amount for timing differences

Table 2: Summary of adjustments

The commission calculated and applied adjustments in the normal value calculations at **Confidential appendix 3.**

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

The commission finds that, during the investigation period, Wei Dat Steel 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

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

3.1.2 Production likeness

Wei Dat Steel 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?

3.2.1 Unrelated customers

For all unrelated customer transactions, the commission finds that Wei Dat Steel sold the domestic goods **at arms 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 Wei Dat Steel:

- sold goods at similar prices to all unrelated customers
- sold goods at similar prices to other sellers in the domestic market.

3.2.2 Related customers

The commission found that Wei Dat Steel sold a small volume of goods to related customers on the domestic market.

For all related customer transactions, the commission finds that Wei Dat Steel sold the domestic goods **at arms 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 Wei Dat Steel:

- sold goods at similar prices to related and unrelated customers
- appeared to genuinely negotiate the price with related customers.

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

The commission finds that Wei Dat Steel's accounting records for the investigation period comply with the generally accepted accounting principles of Malaysia. This is based on the auditor's opinion contained in the financial statements for the 2025 financial year (year ending 30 June 2025), which concluded that Wei Dat Steel's financial accounts comply with the Malaysian accounting standards.

3.4 Did the production records reasonably reflect competitive market costs?

The commission finds that Wei Dat Steel's production records reasonably reflect competitive market costs.

The commission did not identify related-party suppliers or any other evidence of non-competitive market costs.

3.5 Related party suppliers

Wei Dat Steel is predominantly supplied internally with raw materials (drawn steel wire) manufactured from steel wire rod which is purchased from external suppliers.

The commission found that the transfer price recorded was comparable and similar to purchase prices from non-related suppliers.

3.6 Were domestic sales in the ordinary course of trade?

The following table summarises the figures the commission used to assess whether Wei Dat Steel's domestic like goods sales are in the ordinary course of trade.

Component	Details
Extended unprofitability period	The investigation period
Reasonable recoverability period	The investigation period
Price	Net invoice price
Cost	Quarterly cost to make and sell the like goods, including direct selling expenses for each transaction.
Weighted average cost	Weighted average cost to make and sell the like goods over the investigation period, including direct selling expenses for each transaction.

Table 3: Ordinary course of trade assessment details

3.7 Is there a low volume of relevant domestic sales?

The commission finds that Wei Dat Steel sold a sufficient volume of domestic like goods for use in a normal value set under section 269TAC(1).

The commission finds that Wei Dat Steel's domestic like goods sales volume sold in the ordinary course of trade in arm's length transactions was at least 5% of its Australian export goods sales volume.

3.8 Domestic sales volumes for each model

Table 4 details the commission's findings about domestic sales volumes for each corresponding Australian export sales model.

Export MCC	Is the MCC's domestic sales volume 5% or greater the export sales volume?	Treatment of normal value
P-G-A-XL	No	No domestic sales of MCC. Surrogate model P-G-A-M used, with specification adjustment under section 269TAC(8)
P-G-B-S	No	No domestic sales of MCC. Surrogate model P-G-A-S used, with specification adjustment under section 269TAC(8)
P-N-A-S	Yes	Domestic sales of the same MCC permits a proper comparison to exported goods.
P-N-A-XL	Yes	Domestic sales of the same MCC permits a proper comparison to exported goods.

Export MCC	Is the MCC's domestic sales volume 5% or greater the export sales volume?	Treatment of normal value
P-N-B-S	Yes	Domestic sales of the same MCC permits a proper comparison to exported goods.

Table 4: Export models compared to domestic model by volume

The commission's volume analysis is at **Confidential appendix 3.**

4 Appendices and attachments

Confidential Attachment 1	Comparative analysis work program
Confidential Appendix 1	692 – Wei Dat Steel - Appendix 1 – Export Price
Confidential Appendix 2	692 – Wei Dat Steel - Appendix 2 – CTMS
Confidential Appendix 3	692 – Wei Dat Steel - Appendix 3 – Normal Value
Confidential Appendix 4	692 – Wei Dat Steel - Appendix 4 – Dumping Margin