Australian Government
Anti-Dumping Review Panel

Conference Summary

Review No. 181 - Certain strata steel bolts exported from the People's Republic of China

Panel Member	Jan Redfern
Review type	Review of Minister's decision
Date	Friday 7 August 2026
Participants	**Anti-Dumping Commission:** [redacted] **Representation for Anto:** [redacted]
Time opened	1.00pm AEST
Time closed	2.05pm AEST

Purpose

The Anti-Dumping Review Panel (Review Panel) opened the conference with an Acknowledgment of Country.

The purpose of this conference was to obtain further information in relation to the application before the Anti-Dumping Review Panel (Review Panel) in relation to certain strata steel bolts exported from the People's Republic of China.

The conference was held pursuant to section 269ZZHA of the *Customs Act 1901* (the Act).

On 31 July 2026 I requested access from the commission to confidential attachments 4, 5, 6, 9, 10, 14 and 15 to REP 659 in preparation for this conference. A copy of this request will be published online if the Review Panel proceeds to initiate a review.

In the course of the conference, I was able to ask participants to clarify any argument, claim or specific detail contained in their application and ADC Report. The conference was not a formal hearing of the review and was not an opportunity for parties to argue their case before me.

In accordance with section 269ZZHA(2), in making a recommendation under subsection 269ZZK(1), I may have regard to:

(a) further information provided at this conference to the extent that it relates to “relevant information” within the meaning of section 269ZZK(6) of the Act;
(b) any conclusions reached at this conference based on “that relevant information”.

At the time of the conference, I advised the participants:

- That the conference was being recorded and transcribed by Microsoft Teams (as facilitated by the Review Panel’s Secretariat), and that the recording would capture everything said during the conference.
- That the conference was being recorded for the Review Panel to have regard to when preparing a conference summary. The conference summary would then be published on the Review Panel’s website.
- Any confidential information discussed during the conference would be redacted from the conference summary prior to publication.

Prior to the conference, participants were provided with a copy of the Review Panel’s Privacy Statement. The Privacy Statement outlines who the conference recording and transcript may be disclosed to. The Privacy Statement is available on the Review Panel’s website here. The participants indicated that they understood the Privacy Statement and consented to:

- The recording of the conference; and
- The recording being dealt with as set out in the Privacy Statement.

Further information requested

The specific information that the Review Panel sought in this conference was a non-confidential explanation of:

- the methodology used to determine the amount of profit included in ANTO's constructed normal value under regulation 45;
- the basis on which sales of goods in the same general category were identified;
- the calculation of the weighted average profit amount applied to ANTO; and
- the reasons for the change in the profit amount applied to ANTO between the PAD/SEF and the final report.

Further Information Provided by the ADC

The ADC advised that ANTO's domestic sales of like goods did not generate a positive profit margin and, accordingly, profit could not be determined under regulation 45(2).

The ADC further advised that the information available in ANTO's exporter questionnaire response was insufficient to calculate profit on domestic sales of goods in the same general category. The ADC explained that such information is generally obtained during on-site verification and that ANTO was not selected for verification.

The ADC advised that the other cooperating exporters did not have domestic sales of like goods. Rather, those exporters had domestic sales of goods in the same general category. Consequently, the ADC applied regulation 45(3)(c) and calculated a weighted average profit amount using the profit margins achieved by those exporters on domestic sales of goods in the same general category.

The ADC advised that the weighted average was calculated using the value of domestic sales rather than quantities sold, as quantities reported by the exporters were not directly comparable.

Further Clarification Sought by the Review Panel

The Review Panel requested clarification regarding:

- how the ADC identified sales of goods in the same general category for the cooperating exporters;
- the basis for the profit amount applied to ANTO during the PAD and SEF stages; and
- the reasons the profit amount applied to ANTO increased from [redacted] in the final report.

Further Information Provided by the ADC in respect of the above Clarifications Sought

The ADC advised that sales of goods in the same general category were identified using domestic sales information obtained during on-site verification of the cooperating exporters. The ADC confirmed that neither exporter had domestic sales of like goods.

The ADC advised that the profit amount of [redacted] used at the PAD and SEF stages was based solely on the profit margin of one cooperating exporter. The ADC stated that this arose because that exporter's domestic sales were initially treated as sales of like goods, rather than sales of goods in the same general category.

The ADC further advised that, after publication of the PAD, an error was identified in that exporter's profit calculation and corrected. However, the corrected profit figure was not reflected in ANTO's calculation at the SEF stage.

The ADC advised that, following further consideration of the methodology, it concluded that neither cooperating exporter had domestic sales of like goods and that both exporters' domestic sales should instead be treated as sales of goods in the same general category. The ADC therefore recalculated ANTO's profit amount using a weighted average of the profit margins achieved by both exporters on domestic sales of goods in the same general category in accordance with regulation 45(3C).

The ADC advised that this recalculation resulted in the profit amount of [redacted] adopted in the final report.

During the conference, the ADRP advised ANTO that it would be provided with an opportunity to clarify its grounds of review.

The Panel Member thanked participants and advised they would keep the conference open for the purpose of the ADC providing a written response.

The ADC’s response provided after the conference is attached as Annexure A.

Consistent with that discussion, the ADRP wrote to ANTO on 12 August 2026 seeking clarification of its grounds. ANTO responded on 13 August 2026. The ADRP's request and ANTO's response are attached at Annexure B.

Anti-Dumping Review Panel Review No. 181 – Certain strata steel bolts exported from the People's Republic of China

ADRP Conference Friday, 7 August 2026

Written responses to request for information – provided on 11 August 2026 (after conference)

Introduction

Correspondence from the Review Panel

On 29 July 2026, the Anti-Dumping Review Panel (Review Panel) wrote to the Commissioner of the Anti-Dumping Commission (ADC) notifying him that an application had been received from ANTO Mining Equipment Co Ltd seeking review of the Minister for Industry and Innovation and Minister for Science's decision under subsections 269TG(1) and 269TG(2) of the *Customs Act 1901* (the Act), concerning certain strata steel bolts exported from the People's Republic of China (China) (Reviewable Decision). That letter requested the ADC to provide confidential attachments 4,5,6,9,10,14 and 15 to ADC REP 659 by COB 30 July 2026.

On 30 July 2026, the ADC provided the requested documents.

On 31 July 2026, the Review Panel subsequently wrote to the ADC in relation to the conference set down for 7 August 2026. The Review Panel 'advised that the purpose of this conference is to obtain further information and seek clarifications from the Anti-Dumping Commission (ADC) and a better understanding of the reasons for the calculation of normal value under section 269TAC(2)(c) in REP 695 (Section 6.5.2, pages 35 – 37)'. The email continued:

> *One of the issues raised in Anto Mining Equipment Co Pty Ltd's (ANTO) application is that the ADC's report does not provide a sufficient explanation as to why it found it necessary to recalculate ANTO's profit under regulation 45(3)(c), using any other reasonable method and having regard to all relevant information. In particular, the application appears to say that the Commission did not otherwise articulate the basis on which it considered that approach necessary, or explain why the profits and dumping margins of Sandvik Jining Rocbolt Technologies China Co Ltd (Sandvik) and Huanghua Tanrimine Metal Support Co Ltd (Tanrimine) remained unchanged between the SEF and the Final Report, while the applicant's profit rate and dumping margin significantly increased.*
>
> *Further, the purpose of this conference is to provide an opportunity to the applicant, being ANTO, to comment on such clarifications and information provided by the ADC, in relation to its application for review before the Anti-Dumping Review Panel (ADRP) of the Anti-Dumping Notice 2026/058 issued in respect of Certain Strata Steel Bolts exported from the People's Republic of China. The application relates to the determination of "profit" for the purposes of section 269TAC (2)(c)(ii).*

Request for information

The Review Panel, in the same email then requested the following the ADC to provide the following information:

1. … a step-by-step non-confidential narrative of its methodology and analysis for determining profit of the applicant under regulation 45 (3)(c) as set out in the profit worksheet (e) in Confidential Attachment 5 to REP 659 with particular reference to Confidential Attachment 5.
2. In this regard ADC is requested to explain (in a non-confidential narrative format):
    a. The methodology and analysis for identifying "the same general category of goods" for Sandvik as set out in Confidential Attachment 9.
    b. The methodology and analysis for identifying "the same general category of goods" for Tanrimine as referred to in worksheet (e) of Confidential Attachment 14.
    c. The methodology and analysis for calculating the weighted average of the profit margin from Sandvik and Tanrimine based on domestic profit achieved on the same general category of gourds by both exporters (Section 6.5.2, page 36).
    d. Any analysis made by the ADC about whether the applicant had domestic sales of "the same category of goods" for the purposes of the calculation of "profit" under regulation 45 in the investigation.
3. The ADC is requested to provide a step-by-step non-confidential narrative explaining the differences in the calculations for normal value set out in Confidential Attachment 4 to SEF 659, by reference, if relevant, to the differences in the calculations for normal value for Sandvik and Tanrimine in Confidential Attachments 7 and 11 to SEF 659.

Conference – 7 August 2026

The ADC attended a conference with the Review Panel and ANTO on 7 August 2026 at 1pm AEDT and verbally provided information response to the above questions.

The purpose of this document is to record those answers for the record.

Responses

1. Step-by-step non-confidential narrative of its methodology and analysis for determining profit of the applicant under regulation 45(3)(c) as set out in the profit worksheet (e) in Confidential Attachment 5 to REP 659

The commission considered whether profit could be worked out under r 45(2) using data relating to ANTO's production and sale of like goods in the ordinary course of trade (OCOT). The commission calculated the profitability of ANTO's domestic sales in the OCOT in worksheet (e) of Confidential Attachment 5 (rows 1-9) and found that ANTO's sales were unprofitable by a margin of **[CONFIDENTIAL]**. The commission could not therefore work out an amount of profit under r 45(2).

The commission considered whether it could work out the amount of profit realised by ANTO from the sale of the same general category of goods in the domestic market in accordance with r 45(3)(a), however the commission did not have sufficient information to do so. See answer to 2d below.

The commission considered whether it could work out the amount of profit realised by other exporters from the sale of like goods in the domestic market in accordance with r 45(3)(b), however neither of the other 2 exporters sold like goods on the domestic market. As explained below in response to question 3, Tanrimine initially mischaracterised its domestic sales as like goods, which led to an error in the calculation of ANTO's normal value in the SEF.

The commission therefore considered whether it could work out the amount of profit using any other reasonable method and having regard to all relevant information in accordance with r 45(3)(c). Both of the other 2 exporters had profitable domestic sales of the same general category of goods. The commission considered it to be a reasonable approach to work out an amount of profit for ANTO as the weighted average of the actual amounts realised by those exporters from the sale of the same general category of goods on the domestic market.

The commission calculated the weighted average profit of the 2 verified exporters, Sandvik and Tanrimine, in worksheet (e) of Confidential Attachment 5 (rows 18-22). The weighting is based on the value of the domestic sales of each exporter. Weighting by value is preferred to quantity because the common quantity is "pieces" and the of size of each model of bolt can vary significantly. The result is a profit margin of **[CONFIDENTIAL]**.

The source of the profit margins and sales values for Sandvik and Tanrimine is as follows:

- Sandvik – Worksheet (c) of Confidential Attachment 9 (cells B14 and B11).
- Tanrimine – Worksheet (e) of Confidential Attachment 14 (cells B17 and Q21).

2. Explanations of the methodology and analysis for:

a. identifying "the same general category of goods" for Sandvik as set out in Confidential Attachment 9

Sandvik had no domestic sales of like goods (REP 659 at 6.6.3, page 39). During onsite verification Sandvik provided a domestic sales listing of all products. The sales listing is at worksheet (a) of Confidential Attachment 9 and the category of goods is shown in column O. The commission identified all sales under the product category "bolts" as the same general category.

b. identifying "the same general category of goods" for Tanrimine as referred to in worksheet (e) of Confidential Attachment 14

Tanrimine had no domestic sales of like goods (REP 659 at 6.7.3, page 41). During onsite verification Tanrimine provided a domestic sales listing of all products. The commission identified all sales under the product category "friction bolts" as the same general category.

c. calculating the weighted average of the profit margin from Sandvik and Tanrimine based on domestic profit achieved on the same general category of goods by both exporters (Section 6.5.2, page 36)

See answer to 1 above.

d. identifying whether ANTO had domestic sales of "the same category of goods" for the purposes of the calculation of "profit" under regulation 45 in the investigation

ANTO provided information to the commission in a response to the exporter questionnaire (REQ) received on 17 February 2025. Sandvik and Tanrimine also provided REQs. The commission selected Sandvik and Tanrimine for onsite verification of their information. ANTO's information was not verified. The volume of goods exported to Australia by ANTO during the investigation period was **[CONFIDENTIAL]**.

The exporter questionnaire requests information in relation to export sales of the goods to Australia and domestic sales of like goods. It does not request information on domestic sales of the same general category of goods. This information was obtained in relation to Sandvik and Tanrimine during verification, consistent with usual practice.

In its REQ, ANTO provided a breakdown of its total sales and costs by the following product categories:

[CONFIDENTIAL]

It is not apparent which of these other categories were sold on the domestic market and there is no information in ANTO's REQ to calculate the profit on any domestic sales of goods other than like goods.

The commission first calculated variable factors and a dumping margin for ANTO for the purposes of the preliminary affirmative determination (PAD), which was published on 23 December 2025. The PAD stated that the amount of profit in ANTO's constructed normal value was the weighted average amount of profit realised by other exporters from the sale of like goods in the domestic market in China (see PAD 659 at 2.3.1, page 10), however this was not actually the case (see answer to 3 below in relation to errors subsequently identified in that profit calculation).

ANTO requested a copy of its calculations on 24 December 2025, and the commission provided them to ANTO on the same day. On 8 January 2026, ANTO made a submission in relation to the PAD and its dumping margin calculation, which was published on the EPR. ANTO raised 2 issues specifically in response to the calculations, neither of which related to the profit margin.

The commission published the SEF on 6 March 2026. ANTO's dumping margin in the SEF was the same as in the PAD (23.0%). ANTO did not make a submission in response to the SEF.

Following publication of REP 659 on 1 June 2026, where ANTO's dumping margin increased to 28.8% for the reasons set out below in response to 3, ANTO requested a copy of its dumping margin calculations, which the commission provided to ANTO.

3. Step-by-step explanation of difference in ANTO's normal value in REP 659 from SEF 659 by reference to Confidential Attachment 4 (ANTO), Confidential Attachment 7 (Sandvik) and Confidential Attachment 11 (Tanrimine) to SEF 659

There were 2 errors in the profit margin (and resulting normal value) for ANTO in SEF 659:

1. ANTO's profit margin was based only on the profit margin for Tanrimine, not a weighted average of Sandvik and Tanrimine, due to the mischaracterisation of Tanrimine's domestic sales as like goods not the same general category of goods.
2. The Tanrimine profit margin applied was the profit margin calculated for the purposes of the PAD, which contained a calculation error. This error was corrected prior to the SEF and applied to Tanrimine's normal value, but the corrected profit margin was not carried over to ANTO's normal value calculation.

<u>Error 1: Mischaracterisation of Tanrimine's domestic sales</u>

Tanrimine stated in its REQ that it sold like goods on the domestic market, specifically model G-L2-D2-B2 (see Tanrimine REQ at C-2, page 18). The commission similarly stated this in its verification report (see Tanrimine exporter verification report at Table 5, page 12) and relied on this finding for the PAD, which stated that Tanrimine's normal value included its *domestic profit achieved on sales of the goods in the OCOT* (see PAD 659 at 2.3.3, page 11).

As a result, for the purposes of the PAD, the commission:

- treated Sandvik's domestic sales as sales of the same general category of goods
- treated Tanrimine's domestic sales as sales of like goods, and
- consequently, calculated Anto's normal value using *the weighted average amount of profit realised by other exporters from the sale of like goods in the domestic market in China*, i.e. it was based on Tanrimine's profit only.

In response to the PAD, Tanrimine identified an error in the calculation of its profit on domestic sales (see Error 2 below). In examining this issue, the commission identified that Tanrimine's domestic sales were not like goods, but were sales of goods in the same general category. Specifically, friction bolts that are outside the goods description because they are shorter than 2.2 metres in length (the goods description covers bolts of a length from 2.2 to 2.5 metres). The commission clarified this in REP 659 at 6.7.3, page 42.

Unfortunately, the commission did not recognise the implication for ANTO's normal value calculation of the change in treatment of Tanrimine's domestic sales. In response to the SEF, the Australian industry (DSI and Jenmar) submitted that the methodology applied to calculate an amount of profit for ANTO was inconsistent with the findings in relation to Sandvik and Tanrimine (DSI submission at IV and Jenmar submission at IV). In REP 659, the commission responded to these submissions and in doing so:

- clarified that Sandvik and Tanrimine's domestic sales were of the same general category of goods, and
- recalculated ANTO's profit as the weighted average of Sandvik and Tanrimine's domestic sales of the same general category of goods.

Error 2: Reliance on Tanrimine's profit margin calculated for the PAD, not the SEF

In addition to the profit margin applied to ANTO in the SEF being based only on Tanrimine, not a weighted average of Sandvik and Tanrimine (Error 1), the Tanrimine profit margin applied was the profit margin calculated for the purposes of the PAD, which contained a calculation error.

The commission first calculated dumping margins for the purposes of the PAD, which was published on 23 December 2025. The profit margin for Tanrimine's domestic sales was **[CONFIDENTIAL]** calculated in profit worksheet (e) of PAD 659 – Confidential Attachment 9 – Tanrimine – Appendix 3 – Normal value

This profit margin was applied in the normal value calculation for ANTO in profit worksheet (e) of PAD 659 - Confidential Attachment 6 - Anto - Appendix 3 - Normal Value.xlsx

Following the PAD, Tanrimine made a submission regarding a possible calculation error in the calculation of its profit margin. Having considered the submission, the commission recalculated Tanrimine's profit margin for the SEF. This recalculation resulted in a change to the profit margin, as shown in profit worksheet (e) of SEF 659 - Confidential Attachment 11 - Tanrimine - Updated Appendix 3 - Normal value.xlsx.

The commission's oversight was that it did not also recalculate ANTO's normal value after correcting Tanrimine's profit margin. ANTO's normal value in the SEF still contained the erroneous

[CONFIDENTIAL] margin as per worksheet (e) of SEF 659 - Confidential Attachment 4 - Anto - Appendix 3 - Normal Value.xlsx

Correction of the errors in REP 659

Both errors identified above were corrected in determining the profit margin used in ANTO’s normal value calculation in REP 659. In summary:

- the profit margin applied to ANTO in the PAD and SEF was **[CONFIDENTIAL]**, which was purported to be the profit margin on Tanrimine’s domestic sales only
- while the correct profit margin for Tanrimine changed, the inclusion of Sandvik’s margin results in a weighted average profit margin of **[CONFIDENTIAL]**.

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Annexure B – correspondence between ADRP and ANTO 12 and 13 August 2026

ADRP emailed ANTO on 12 August 2026 as follows:

Dear [redacted],

Thank you for your participation in the conference with the Anti-Dumping Review Panel on Friday 7 August 2026.

During the conference, Panel Member Jan Redfern PSM noted that she had asked whether the information provided by the Anti-Dumping Commission assisted ANTO's understanding of the issues raised in **Ground 2**, and whether ANTO wished to refine or narrow any aspect of that ground. The Member noted that you indicated you would need to seek instructions from your client and that, while ANTO would likely still wish to pursue a review, some aspects of Ground 2 may not ultimately be pursued.

The Member has asked the Secretariat to write to confirm ANTO's position. In particular, if ANTO wishes to refine or narrow Ground 2 in light of the information provided during the conference, please provide details of any proposed amendments.

The Member has requested that any response from ANTO be provided **no later than close of business (AEST) Friday 14 August 2026**.

Kind regards,

[redacted]

ANTO responded to the ADRP on 13 August 2026 as follows:

Dear [redacted],

ANTO thanks the Review Panel for convening the conference on 7 August 2026, and for inviting ANTO's representatives to hear the Commission's explanations in response to the Review Panel's queries. As the Review Panel will appreciate, those explanations provided significantly more detail about the processes undertaken by the Commission, and the errors that the Commission says arose in those processes, than was available to ANTO in the Commission's reports in investigation 659.

In light of that further explanation, ANTO's position with respect to the two grounds for review in its application to the Review Panel is as follows.

Ground 1

ANTO maintains its concern outlined in ground 1 of the application for review. It now appears from the Commission's explanation that the Commission:

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- calculated profit for Sandvik and Tanrimine using sales of the same general category of goods based on information not included in the responses to the exporter questionnaire, but requested from those exporters during verification; and
- did not undertake the same approach for ANTO because the Commission decided not to verify ANTO's data, and not to request ANTO to provide information about its sales of the same general category of goods.

I am instructed that if ANTO had been asked for that information (and if it is asked for it now) it could be provided within a week. ANTO notes that it would be open to the Review Panel to require the Commission to reinvestigate the sales by ANTO of the same general category of goods. If it did so, ANTO would be in a position to provide the data in respect of those sales.

In the Commission's calculations for ANTO for the Preliminary Affirmative Determination and the Statement of Essential Facts the profit margin that the Commission used for ANTO was [redacted]% - which ANTO considered not unreasonable. Accordingly, ANTO did not make any submission about that profit margin, did not come to understand why the Commission had taken a different approach to its assessment of ANTO's profit margin, and did not offer to make its data available to the Commission.

If the Commission had not made the repeated errors it now says that it made, and had said that it was going to apply a profit margin of [redacted]% at either stage of the investigation, ANTO would have had the opportunity to make submissions and offer its data. It would have done so because [redacted]% is materially higher than its profit margin on such goods. By the Commission's errors and lack of disclosure about them ANTO was deprived of that opportunity.

For those reasons, ANTO maintains ground 1 of its application for review.

Ground 2

The information provided by the Commission in response to the Review Panel's request for information seeks, in effect, to explain why the Commission's calculation of the weighted average profit margin that was used for ANTO was not an error by pointing to two or three aspects of the Commission's process where it made errors.

Given those claimed errors, that those errors were not adequately disclosed until now, and that the underlying calculations of the profit margins for Sandvik and Tanrimine are not available to ANTO, ANTO remains concerned that there may be additional calculation errors that have not been identified by the Commission, or disclosed.

For that reason, ANTO maintains ground 2 of its application, and asks that the Review Panel consider whether the calculations did involve errors not now disclosed by the Commission.

Kind regards
[redacted]