Australian Government
Anti-Dumping Review Panel

Application for review of a Ministerial decision

***Customs Act 1901* s 269ZZE**

This is the approved[1] form for applications made to the Anti-Dumping Review Panel (Review Panel) on or after 20 October 2025 for a review of a reviewable decision of the Minister.

Any interested party[2] may lodge an application to the Review Panel for review of a Ministerial decision.

All sections of the application form must be completed unless otherwise expressly stated in this form.

The Review Panel maintains a public record for reviews of decisions of the Minister. If a review is initiated, a copy of the application will be placed on the Review Panel's website.

Please note that the existence of applications will be disclosed on the Review Panel's 'Pending Applications and Duty Assessments' webpage prior to initiation, including the following information:

- Relevant reviewable decision
- Country and goods to which the application relates
- Number of applications
- Status (e.g. application/s under consideration)

Time
Applications must be made within 30 days after public notice of the reviewable decision is first published.

Conferences
The Review Panel may request that you or your representative attend a conference for the purpose of obtaining further information in relation to your application. The conference may be requested any time after the Review Panel receives the application for review and before beginning to conduct a review. Failure to attend this conference without reasonable excuse may lead to your application being rejected. See the Review Panel website for more information.

Further application information
You or your representative may be asked by the Member to provide further information in relation to your answers provided to questions 9, 10, 11 and/or 12 of this application form (s 269ZZG(1)). See the Review Panel website for more information.

[1] By the Senior Member of the Anti-Dumping Review Panel under section 269ZY *Customs Act 1901*.
[2] As defined in section 269ZX *Customs Act 1901*.

Withdrawal
You may withdraw your application at any time, by completing the withdrawal form on the Review Panel website.

International Trade Remedies Advisory (ITRA) Service
Small and medium enterprises (i.e., those with less than 200 full-time staff, which are independently operated and which are not a related body corporate for the purposes of the *Corporations Act 2001*), may obtain assistance, at no charge, from the ITRA Service.

For more information on the ITRA Service, visit www.business.gov.au or telephone the ITRA Service Hotline on +61 2 6213 7267

Contact
If you have any questions about what is required in an application refer to the Review Panel website. You can also call the Review Panel Secretariat on (02) 6276 1781 or email adrp@industry.gov.au.

PART A: APPLICANT INFORMATION

1. Applicant's details

Applicant's name: Anto Mining Equipment Co Ltd
Address: Wenhua Road 6th ,Dawenkou industrial Park ,Tai'an City, Shandong Province,China, Taian, Shandong, China
Type of entity (trade union, corporation, government etc.): Corporation

2. Contact person for applicant

Full name: Deng Junsheng
Position: Sales Manager
Email address: rockbolt@antobolts.com
Telephone number: 86-17753832266

3. Set out the basis on which the applicant considers it is an interested party:

The applicant is an exporter of the goods the subject of the Minister's decision, and is directly concerned with the exportation of the goods into Australia. Accordingly, it is an "interested party" under paragraph (c)(i) of the definition of *interested party* in section 269ZX of the *Customs Act 1901* (Cth).

4. Is the applicant represented?

Yes ☒ **No** ☐

If the application is being submitted by someone other than the applicant, please complete the attached representative's authority section at the end of this form.

It is the applicant's responsibility to notify the Review Panel Secretariat if the nominated representative changes or if the applicant become self-represented during a review.*

PART B: REVIEWABLE DECISION TO WHICH THIS APPLICATION RELATES

5. **Indicate the section(s) of the *Customs Act 1901* the reviewable decision was made under:**

☒Subsection 269TG(1) or (2) – decision of the Minister to publish a dumping duty notice

☐Subsection 269TH(1) or (2) – decision of the Minister to publish a third country dumping duty notice

☐Subsection 269TJ(1) or (2) – decision of the Minister to publish a countervailing duty notice

☐Subsection 269TK(1) or (2) decision of the Minister to publish a third country countervailing duty notice

☐Subsection 269TL(1) – decision of the Minister not to publish duty notice

☐Subsection 269ZDB(1) – decision of the Minister following a review of anti-dumping measures

☐Subsection 269ZDBH(1) – decision of the Minister following an anti-circumvention enquiry

☐Subsection 269ZHG(1) – decision of the Minister in relation to the continuation of anti-dumping measures

Please only select **one** box. If you intend to select more than one box to seek review of more than one reviewable decision(s), **a separate application must be completed**.

6. **Provide a full description of the goods which were the subject of the reviewable decision:**

The reviewable decision concerned strata steel bolts exported from China. The goods are described in Final Report 659 as follows:

"*Certain strata reinforcing steel bolts, hollow, made from flat rolled steel, whether or not metallic coated (e.g. galvanised), whether or not containing alloys, with an outside diameter from 44 millimetres up to and including 48 millimetres, of a length from 2.2 metres up to and including 2.5 metres, of a base metal thickness from 2.8 millimetres up to and including 3.4 millimetres, whether or not including the welded ring.*

Further information on the goods is provided in the application. Below are some key extracts from the application.

A strata bolt of a kind the subject of this application, referred to as a friction bolt, is manufactured from HRC. All forms of HRC feed material are considered relevant to the goods, regardless of the particular grade or alloy content.

HRC is roll-formed into a hollow C-shape section with the diameter measured at the non-tapered end. A steel ring is welded at one end of the bolt, with the other end tapered.

For metallic coated friction bolts, the minimum/maximum coating thickness requirements are applied.

The subject goods are typically/nominally 2.4 metres in length, 47 mm in diameter at the non-tapered end, and with a base metal thickness of 3.2 mm.

Where the nominal and actual measurements vary, a product is within the scope if application of either the nominal or actual measurement would place it within the scope based on the definition set forth above.

The following exclusions apply to the goods the subject of the application:

Excluded from this application are strata reinforcing bolts that contain a solid centre reinforcing bar and locking system. These goods, commonly referred to as a mechanical point anchored bolt or mechanical lock, are used in underground strata support applications and include a tensionable point anchor by way of an internal solid steel bolt."

7. Provide the tariff classifications/statistical codes of the imported goods:

According to the Commission's Final Report 659, the goods are classified to the following tariff subheadings in Schedule 3 to the *Customs Tariff Act 1995* in Table 9:

Tariff classification		
Tariff code	*Statistical code*	*Description*
7304	***Tubes, pipes and hollow profiles, seamless, of iron (other than cast iron) or steel***	
7304.51.00	*30*	Tubes, pipes and hollow profiles, seamless, of iron or steel, cold-drawn or cold-rolled (cold reduced).
7318	***Screws, bolts, nuts, coach screws, screw hooks, rivets, cotters, cotter-pins, washers (including spring washers) and similar articles, of iron or steel***	
7318.15.00	56	Expansion bolts, U-bolts and shackle bolts of iron or steel.
7318.15.00	65	Bolts (incl. bolt ends and screw studs but excl. expansion, U-, shackle, cup square, hexagonal head and high tensile bolts) of iron or steel, excluding 10 mm in diameter.
7318.24.00	22	Cotters and cotter pins.
7318.19.00	03	Threaded articles of iron or steel, not elsewhere specified.
7318.19.00	19	Threaded articles of iron or steel, not elsewhere specified.

7308	***Structures (excluding prefabricated buildings of 9406) and parts of structures (for example, bridges and bridge-sections, lock-gates, towers, lattice masts, roofs, roofing frameworks, doors and windows and their frames and thresholds for doors, shutters, balustrades, pillars and columns), of iron or steel; plates, rods, angles, shapes, sections, tubes and the like, prepared for use in structures, of iron or steel***	
7308.40.00	05	Equipment for scaffolding, shuttering, propping or pit-propping.

8. Anti-Dumping Notice details:

Anti-Dumping Notice (ADN) number: 2026/058
Date ADN was published: 1 June 2026

****Attach a copy of the notice of the reviewable decision (as published on the Anti-Dumping Commission's website) to the application****

PART C: GROUNDS FOR THE APPLICATION

If this application contains confidential or commercially sensitive information, the applicant must provide a non-confidential version of the application that contains sufficient detail to give other interested parties a clear and reasonable understanding of the information being put forward.

Confidential or commercially sensitive information must be highlighted in yellow, and the document marked '**CONFIDENTIAL**' (bold, capitals, red font) at the top of each page. Non-confidential versions should be marked '**NON-CONFIDENTIAL**' (bold, capitals, black font) at the top of each page.

- Personal information contained in a non-confidential application will be published unless otherwise redacted by the applicant/applicant's representative.

For lengthy submissions, responses to this part may be provided in a separate document attached to the application. Please check this box if you have done so: ☒

Please note: Failure to adequately and accurately respond to questions 9 – 12 below may result in the application or ground/s being rejected pursuant to s 269ZZG(2) or s 269ZZG(5) of the *Customs Act 1901*. Where there are multiple grounds of review, it is important to address each of the questions below for each ground.

9. Set out the grounds on which the applicant believes that the reviewable decision is not the correct or preferable decision:

Note: Each ground should be articulated as a short, clear statement. Reasons to support the ground of review should be included in Question 11. See Attachment B.

10. Identify what, in the applicant's opinion, the correct or preferable decision (or decisions) ought to be, resulting from the grounds raised in response to question 9:

See Attachment B.

11. Set out how the grounds raised in question 9 support the making of the proposed correct or preferable decision:

See Attachment B.

12. Set out the reasons why the proposed decision provided in response to question 10 is materially different from the reviewable decision:

Do not answer question 12 if this application is in relation to a reviewable decision made under subsection 269TL(1) of the Customs Act 1901.

See Attachment B.

13. Please list all attachments provided in support of this application:

- Attachment A – *Anti-dumping notice 2026/058*
- Attachment B – *Submissions on grounds for review*

PART D: DECLARATION

The applicant's authorised representative declares that:

- The applicant understands that the Review Panel may hold conferences in relation to this application, either before or during the conduct of a review. The applicant understands that if the Review Panel decides to hold a conference *before* it gives public notice of its intention to conduct a review, and the applicant (or the applicant's representative) does not attend the conference without reasonable excuse, this application may be rejected; and
- The information and documents provided in this application are true and correct. The applicant understands that providing false or misleading information or documents to the Review Panel is an offence under the *Customs Act 1901* and *Criminal Code Act 1995*.

Signature:

Name: Andrew Korbel

Position: Partner

Organisation: Corrs Chambers Westgarth

Date: 18 / 06 / 26

PART E: AUTHORISED REPRESENTATIVE

This section must only be completed if you answered yes to question 4.

Provide details of the applicant's authorised representative:

Full name of representative: Andrew Korbel
Organisation: Corrs Chambers Westgarth
Address: Level 37, 50 Bridge Street Sydney NSW 2000
Email address: Andrew.korbel@corrs.com.au
Telephone number: (02) 9210 6537

The applicant is also represented by:

Full name of representative: Jia Zheng
Organisation: Zhong Yin Lawyers
Address: 11-12th Floor, Building 2, Zhengda Center, No. 20 Jinhe East Road, Chaoyang District, Beijing, China
Email address: jiazheng@zhongyinlawyer.com
Telephone number: 86-10-65876666-8240

Representative's authority to act

A separate letter of authority may be attached in lieu of the applicant signing this section

Each person named above is authorised to act as the applicant's representative in relation to this application and any review that may be conducted as a result of this application.

Signature: Deng Junsheng
(Applicant's authorised officer)

Name: Deng Junsheng

Position: Sales Manager

Organisation: Anto Mining Equipment Co Ltd

Date: June 18, 2026

Australian Government
Department of Industry, Science and Resources

Anti-Dumping Commission

Customs Act 1901 – Part XVB

Certain Strata Steel Bolts

Exported from the People's Republic of China

Findings in relation to a dumping investigation

Public notice under sections 269TG (1) and (2) of the Customs Act 1901

Anti-Dumping Notice (ADN) 2026/058

The Commissioner of the Anti-Dumping Commission (the Commissioner) has completed the investigation into the alleged dumping of certain strata steel bolts (the goods) exported to Australia from the People's Republic of China (China).

A full description of the goods is available in Anti-Dumping Notice (ADN) number 2024/108. This ADN is available on the public record at www.adcommission.gov.au.

The Commissioner reported his findings and recommendations to me in *Anti-Dumping Commission Report No 659* (REP 659), in which he outlines the investigations carried out and recommends the publication of a dumping duty notice in respect of the goods. I have considered REP 659 and accepted the Commissioner's recommendations and reasons for the recommendations, including all material findings of fact or law on which the Commissioner's recommendations were based, and particulars of the evidence relied on to support the findings. The report is available at www.adcommission.gov.au.

Particulars of the dumping margins established and rates of interim dumping duty (IDD) are set out in the following table:

Exporter	Duty method	Dumping margin	Interim dumping duty rate[1]
Anto Mining Equipment Co Ltd	*Ad valorem*	28.8%	15.1%
Sandvik Jining Rocbolt Technologies China Co Ltd	*Ad valorem*	10.2%	3.5%
Huanghua Tanrimine Metal Support Co Ltd	*Ad valorem*	3.4%	0.0%
All other exporters	*Ad valorem*	35.2%	24.8%

I, TIM AYRES, the Minister for Industry and Innovation and Minister for Science, have considered, and accepted, the recommendations of the Commissioner, the reasons for the recommendations, the material findings of fact on which the recommendations are based, and the evidence relied on to support those findings in REP 659.

[1] The rate of IDD is less than the full dumping margin due to removal of the less than adequate remuneration subsidy program (*Program 590-20 – hot rolled steel provided by government at less than fair market value*) from the IDD to avoid any 'double counting' of the effect of that program on the dumping margin, refer REP 659, chapter 12.

I am satisfied, as to the goods that have been exported to Australia, that the amount of the export price of the goods is less than the normal value of those goods and because of that, material injury to the Australian industry producing like goods might have been caused if the security had not been taken. Therefore, under section 269TG(1) and section 45 of the *Customs Act 1901* (the Act), I DECLARE that section 8 of the *Customs Tariff (Anti-Dumping) Act 1975* (the Dumping Duty Act) applies to:

(i) the goods; and

(ii) like goods that were exported to Australia after the Commissioner made a Preliminary Affirmative Determination under section 269TD on 23 December 2025 but before the publication of this notice.

I am also satisfied that the amount of the export price of like goods that have already been exported to Australia is less than the amount of the normal value of those goods, and the amount of the export price of like goods that may be exported to Australia in the future may be less than the normal value of the goods and because of that, material injury to the Australian industry producing like goods has been caused or is being caused. Therefore, under section 269TG(2) of the Act, I DECLARE that section 8 of the Dumping Duty Act applies to like goods that are exported to Australia after the date of publication of this notice.

This declaration applies in relation to all exporters of the goods and like goods from China.

The considerations relevant to my determination of material injury to the Australian industry caused by dumping are the size of the dumping and subsidy margins, the effect of dumped and subsidised imports on prices in the Australian market in the form of price undercutting and the consequent impact on the Australian industry including price depression, price suppression and reduced profits and profitability.

In making my determination, I have considered whether any injury to the Australian industry is being caused or threatened by a factor other than the exportation of dumped goods, and have not attributed injury caused by other factors to the exportation of those dumped goods.

Interested parties may seek a review of this decision by lodging an application with the Anti-Dumping Review Panel, in accordance with the requirements in Division 9 of Part XVB of the Act, within 30 days of the publication of this notice.

Particulars of the export prices, non-injurious prices, and normal values of the goods (as ascertained in the confidential tables to this notice) will not be published in this notice as they may reveal confidential information.

Clarification about how measures are applied to 'goods on the water' is available in ACDN 2012/34, available at www.adcommission.gov.au.

REP 659 and other documents included in the public record may be examined at the Anti-Dumping Commission office by contacting the case manager on the details provided below. Alternatively, the public record is available at www.adcommission.gov.au.

Enquiries about this notice may be directed to the Investigations 2 team by email or our client support team by telephone or email:

- Investigations 2 email: investigations2@adcommission.gov.au
- Client support telephone number: + 61 2 6213 6000
- Client support email: clientsupport@adcommission.gov.au.

Dated this 29th day of May 2026

TIM AYRES

Minister for Industry and Innovation and Minister for Science

中银律师事务所
ZHONG YIN LAW FIRM

CORRS
CHAMBERS
WESTGARTH

THIS IS 'ATTACHMENT B' TO THE APPLICATION FOR REVIEW OF A MINISTERIAL DECISION IN RESPECT OF ANTI-DUMPING NOTICE 2026/058 IN INVESTIGATION 659 CONCERNING CERTAIN STRATA STEEL BOLTS EXPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA

1 This document accompanies the application to the Anti-Dumping Review Panel (**Review Panel**) by ANTO Mining Equipment Co Ltd (**Applicant**) for review of the decision of the Minister of Industry and Innovation (**Minister**) recorded in Anti-Dumping Notice 2026/058, published on 1 June 2026 (**Reviewable Decision**).

2 The document records sections 9 to 12 of the Applicant's application to the Review Panel.

9 Grounds on which the applicant believes that the Reviewable Decision is not the correct or preferable decision

9.1 Ground 1

3 In determining a constructed normal value for the Applicant's domestic sales, the Commission adopted an approach to calculation of profit for the Applicant which, without any proper reason, was different to the calculation of the profit included in the constructed normal value for the only other two co-operative exporters, Sandvik Jining (**Sandvik**) and Huanghua Tanrimine (**Tanrimine**). For the Applicant the Commission says that it calculated profit using the weighted average profit of Sandvik and Tanrimine, based on their sales of the same general category of goods. For Sandvik and Tanrimine, the Commission included in the constructed normal value each exporter's own domestic profit achieved on the same general category of goods as the subject goods.

9.2 Ground 2

4 In determining a constructed normal value for the Applicant's domestic sales, the Commission adopted an amount for profit which was said to be calculated using the weighted average profit of two other co-operative exporters, Sandvik and Tanrimine, achieved on the same general category of goods as the subject goods. The calculation undertaken was incorrect.

10 Correct or preferable decision

5 The Applicant seeks review of the Reviewable Decision only in so far as that decision concerns the normal value ascertained for the Applicant.

6 The Applicant submits that the correct or preferable decision in respect of that aspect of the Minister's decision would be to ascertain a normal value for the Applicant in which profit was calculated using the Applicant's domestic profit achieved on the same general category of goods. The dumping margin for the Applicant should then be adjusted to reflect that revised normal value.

11 The grounds of review support the making of the proposed correct or preferable decision

11.1 Ground 1: Differing profit rate methodologies

7 In determining any dumping margin, the Commission is required to use the normal value of the goods exported to Australia, unless an exception applies. In the current investigation, the Commission found that, as a result of a particular market situation in China, sales of strata bolts in the Chinese market were not suitable for determining a normal value. Accordingly, the Commission determined constructed normal values for each exporter.

8 As the Review Panel will be aware, pursuant to section 269TAC(2)(c) of the *Customs Act 1901* (Cth) (**Act**), in constructing a normal value the Commission must consider:

(a) the cost of production of the goods in the country of export;

(b) assuming that the goods had been sold for home consumption instead of exported, the administrative, selling and general costs associated with the sale; and

(c) *profit on this sale*.

9 The Applicant submits that its constructed normal value was distorted by the Commission applying a profit rate methodology that was inconsistent to that which the Commission applied to Sandvik and Tanrimine.

10 The Commission calculated Sandvik and Tanrimine's profits as "domestic profit achieved on the same general category of goods" under section 45(3)(a) of the *Customs (International Obligations) Regulation 2015* (**Regulation**). By contrast, the Commission says that it determined the Applicant's profit by calculating the weighted average profit of Sandvik and Tanrimine as determined in their respective normal value calculations (that is, based on their sales of the same general category of goods).

11 The Commission based its calculation on sales of the same general category of goods as neither Sandvik nor Tanrimine sold like goods for home consumption in China. However, the Commission also found that the Applicant did not make a profit on its domestic sales of like goods in the ordinary course of trade.

12 Despite the comparable situations of the Applicant, Sandvik and Tanrimine, being that none of these exporters experienced domestic profit on like goods, the Commission, seemingly arbitrarily, adopted differing profit methodologies.

13 The Commission failed to provide an explanation for this difference in approach. The only statement in the Final Report that might explain the Commission's approach says that the Commission "found it was necessary to recalculate Anto's profit under section 45(3)(c) of the Regulation using any other reasonable method and having regard to all relevant information". The Commission did not otherwise articulate on what basis it considered this approach necessary.

14 To ensure consistency in its approach, the Commission should have determined the Applicant's profit on the basis of the Applicant's sales of the same general category of goods, as it had done for Sandvik and Tanrimine.

15 This inconsistency has prejudiced the Applicant by providing an entitlement to Sandvik and Tanrimine, being the adoption of their sales data, that is not afforded to the Applicant. Instead, the Applicant is relegated to a position where the dumping margin imposed on it is, without justification, reliant on data provided by its competitors.

11.2 Ground 2: Incorrect calculation of weighted average profit rate

16 As noted above, the Commission determined the Applicant's profit by calculating the weighted average profit of Sandvik and Tanrimine from their sales of the same general category of goods as the subject goods.

17 In the Final Report, the Commission clarified and amended the following with respect to Sandvik and Tanrimine's profit calculations as a result of submissions made by the Australian industry members in the investigation, following the SEF:

(a) Sandvik's domestic profit was calculated based on the general product category classified as "bolts". This category includes all other types of mining support bolts sold domestically by Sandvik, excluding "cable bolt" type products;

(b) the Commission rectified an error relating to the calculation of Tanrimine's profit margin; and

(c) the Commission made a correction to the SEF to the effect that Tanrimine's profit had been determined using domestic profit achieved on the same general category of goods. The amount of profit calculated for Tanrimine remained unchanged.

18 Despite these clarifications, from the SEF to the Final Report Sandvik and Tanrimine's dumping margins remained consistent, while the dumping margin calculated for the Applicant increased from 23% to 28.8%.

19 Confidential Attachments 4, 5 and 6 to the Final Report, and the corresponding attachments to the SEF show no changes to the calculation of the constructed normal value for the Applicant between the SEF and the Final Report other than to profit. These Confidential Attachments also show that the profit that the Commission attributed to the Applicant increased substantially from [redacted]% in the SEF to [redacted]% in the Final Report.

20 If the Applicant's profit rate is based on a weighted average of Sandvik and Tanrimine's profits, it would logically follow that the Applicant's profit rate could not substantially increase in the absence of any corresponding change to the profit of the other two exporters on which the Commission based the profit calculation for the Applicant.

21 In the Final Report, the Commission indicated that the profit calculation methodology and the amount of profit determined for Tanrimine remained unchanged. Although it is not stated in the Final Report, it appears that the amount of profit for Sandvik also remained unchanged between the SEF and the Final Report. This is apparent from:

(a) the unchanged final dumping margin, as compared to the dumping margin in the SEF, for Sandvik;

(b) the information available to the Applicant in Confidential Attachments 4, 5 and 6 to the Final Report, and the corresponding attachments to the SEF; and

(c) the explanation in the Final Report of changes in the normal value calculations following the SEF for the three exporters. In particular, it is not suggested in the Final Report that there were any changes, following the SEF, to the HRC Adjustment Factor, or the CTMS, for either Sandvik or Tanrimine.

22 In correspondence after the Reviewable Decision (**Annexure 1**), the Commission advised the Applicant that it is unable to disclose to it the calculation that results in the [redacted]% profit amount, as the calculation contains information that is confidential to Sandvik and Tanrimine. In further correspondence, the Commission also clarified that the [redacted]% profit for the Applicant

calculated for the SEF involved a calculation error and therefore cannot be reconciled with the [redacted]% profit calculated for the Final Report. However, the Commission failed to explain why the profits and dumping margins of Sandvik and Tanrimine remained unchanged between the SEF and the Final Report, while the profit rate and dumping margin of the Applicant significantly increased.

23 At any rate, the Applicant respectfully submits that the underlying discrepancy persists even where it is accepted that the [redacted]% figure in the SEF was the result of a calculation error.

12 The proposed decision is materially different from the Reviewable Decision

24 The proposed decision set out in section 10 above is materially different to the Reviewable Decision because it would materially reduce the normal value, and the dumping margin, applicable to the Applicant, and as a result the duty imposed on exports of the subject goods by the Applicant to Australia.

From: [redacted]
Sent: Monday, 15 June 2026 2:13 PM
To: jiazheng@zhongyinlawyer.com
Cc: Anti-Dumping Commission Investigations 2
Subject: RE: 659 - Commissioner has made a preliminary affirmative determination [SEC=OFFICIAL]

OFFICIAL

Dear Jia Zheng

Thank you for your well-reasoned email. I again apologise for the delay in responding – I have been ill and not at work.

Your conclusions are correct, except the [redacted]% figure is the figure that had the calculation error. You will not be able to reconcile between [redacted]% and [redacted]% for this reason.

[redacted]% is consistent with the *Customs (International Obligations) Regulation 2015* (Regulations) as described at page 36 of the final report. [redacted]% has been calculated correctly, more specifically, based on accurate information and weighted correctly.

I believe the reason for confusion is that **Anto's profit calculation for the preliminary affirmative determination was incorrect**. This is an issue that was brought to the attention of the commission in two submissions by the applicants available at EPR items 26 and 27. As a result of this submission, I again turned my mind to the profit amount that should be applied to Anto under the Regulations. The commission's comments on this issue are at page 36 of the final report.

Regards

[redacted]

[redacted]
Assistant Director

Anti-Dumping Commission | Investigations Branch | Investigations 2
Wurundjeri Country, 215 Spring Street, Melbourne VIC 3000
Department of Industry, Science and Resources
Phone [redacted] | **Email** [redacted]

OFFICIAL

From: jiazheng@zhongyinlawyer.com <jiazheng@zhongyinlawyer.com>
Sent: Wednesday, 10 June 2026 6:14 PM
To: [redacted]
Cc: Anti-Dumping Commission Investigations 2 <Investigations2@adcommission.gov.au>
Subject: 回复: 659 - Commissioner has made a preliminary affirmative determination [SEC=OFFICIAL:Sensitive]

NON-CONFIDENTIAL

CAUTION - This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear [redacted]

We understand that the profit rates of Sandvik Jining and Huanghua Tanrimine are confidential information.

On the basis of the preliminary determination, the essential facts and the final reports, their profit rates are supposed as follows:

Situation 1

Name of Producers	**Profit Rates in PD**	**Profit Rates in EF**	**Profit Rates in Final Report**
Sandvik Jining Rocbolt Technologies China Co., Ltd	> [redacted] %	> [redacted] %	> [redacted] %
Huanghua Tanrimine Metal Support Co., Ltd	< [redacted] %	< [redacted] %	< [redacted] %

This situation is impossible because Sandvik Jining's profit and dumping margin remain nearly unchanged in the final report.

Situation 2

Name of Producers	**Profit Rates in PD**	**Profit Rates in EF**	**Profit Rates in Final Report**
Sandvik Jining Rocbolt Technologies China Co., Ltd	> [redacted] %	> [redacted] %	< [redacted] %
Huanghua Tanrimine Metal Support Co., Ltd	< [redacted] %	< [redacted] %	> [redacted] %

This situation is impossible because Huanghua Tanrimine's dumping margin is reduced in the final report.

Situation 3

Name of Producers	**Profit Rates in PD**	**Profit Rates in EF**	**Profit Rates in Final Report**
Sandvik Jining Rocbolt Technologies China Co., Ltd	< [redacted] %	< [redacted] %	< [redacted] %
Huanghua Tanrimine Metal Support Co., Ltd	> [redacted] %	> [redacted] %	> [redacted] %

This situation is impossible because Huanghua Tanrimine's dumping margin is reduced in the final report.

Situation 4

Name of Producers	**Profit Rates in PD**	**Profit Rates in EF**	**Profit Rates in Final Report**
Sandvik Jining Rocbolt Technologies China Co., Ltd	< [redacted] %	< [redacted] %	> [redacted] %
Huanghua Tanrimine Metal Support Co., Ltd	> [redacted] %	> [redacted] %	< [redacted] %

This situation is impossible because Sandvik Jining's profit and dumping margin remain nearly unchanged in the final report.

In all possible situations, we are unable to calculate a weighted average profit rate as [redacted]% on the basis of Sandvik Jining and Huanghua Tanrimine's rates.

We respectfully request the Commission to check whether there is any error in the calculation of the weighted average rate for ANTO.

Best Regards,

贾征 / Jia Zheng
高级合伙人 / Senior Partner

中银律师事务所 / Zhong Yin Law Firm
北京市朝阳区光华路正大中心北塔11-12层
11-12th Floor, Building 2, Zhengda Center, No. 20 Jinhe East Road, Chaoyang District, Beijing
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发送时间: 2026年6月9日 13:02
收件人: '[redacted]>
抄送: 'Anti-Dumping Commission Investigations 2' <Investigations2@adcommission.gov.au>
主题: 回复: 659 - Commissioner has made a preliminary affirmative determination [SEC=OFFICIAL:Sensitive]

Dear [redacted]

Thanks a lot for the documents and the clarification.

I have a doubt on the profit rate[redacted]% and want to discuss this issue with you.

The dumping margins of the exproters in this case are as follows:

No.	Name of Producers	DM in EF	DM in Final Report
1	Anto Mining Equipment Co., Ltd	23.3%	28.8%
2	Sandvik Jining Rocbolt Technologies China Co., Ltd	10.5%	10.2%
3	Huanghua Tanrimine Metal Support Co., Ltd	14.3%	3.4%
4	Others	35.2%	35.5%

On the basis of the above table and the final report, we can reach the following conclusions:

1) From EF to final reports, the HRC Adjustment factor applied to all producers is not changed.
2) From EF to final reports, CTMS of each producer is not changed.
3) From EF to final reports, profit applied to Sandvik Jining is re-calculated and slightly lowered.
4) From EF to final reports, profit applied to Huanghua Tanrimine is re-calculated and significently lowered.

If The commission determined an profit for ANTO by calculating the weighted average profit of Sandvik Jining and Huanghua Tanrimine, how such profit could be increased from [redacted]% to[redacted]% ?

We respectfully request the Commission to clarify this issue.

Best Regards,

贾征 / Jia Zheng
高级合伙人 / Senior Partner

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OFFICIAL

Dear Jia Zheng

Thank you for your patience. I have attached Anto's appendices as requested.

You had some questions about profit in another email chain. I hope the following information answers your queries:

- Anto's profit was determined under Regulation 45(3)(c) using any other reasonable method and having regard to all relevant information.
- Anto did not make a profit on its domestic sales of like goods in the ordinary course of trade.
- The commission determined an amount for profit by calculating the weighted average profit of Sandvik Jining and Tanrimine as determined in their respective normal value calculations (based on their sales of the same general category of goods)
- That profit amount is [redacted]%.
- The commission consider that for the purposes of regulation 45(4), the amount of profit determined and applied in regard to Anto's domestic sales does not exceed the amount of profit normally realised by other exporters on sales of goods in the same general category in the domestic market in China by nature of being the weighted average of the amount actually achieved by those other exporters.
- The commission can't disclose the calculation that results in the [redacted]% profit amount as it contains information confidential to Sandvik Jining and Tanrimine.
- I have reviewed that calculation again this morning and can confirm that it is accurate / free from error.

Please let me know if you have any further questions.

Regards