

**THE DIRECTOR, INVESTIGATIONS 1**

Australian Trade Remedies Commission
GPO Box 2013
CANBERRA ACT 2600

BY EMAIL:

investigations1@adcommission.gov.au

29 September 2026

Dear Director,

RE: Dumping Investigation No. 692 – Certain welded steel mesh sheets exported from the People’s Republic of China and Malaysia

**MALAYSIAN EXPORTER VERIFICATION REPORTS & FILE NOTES - AUSTRALIAN INDUSTRY
REQUEST FOR FURTHER PARTICULARS**

InfraBuild (Newcastle) Pty Ltd (**InfraBuild**) is an Australian industry applicant¹ for the publication of a dumping duty notice in respect of certain welded steel mesh sheets (**mesh**) exported to Australia from the People’s Republic of China (**China**) and Malaysia.

The Statement of Essential Facts (**SEF**) in this matter is due to be published by the Australian Trade Remedies Commission (**Commission**) on 30 September 2026. The following reports and file notes were published on the Electronic Public Record (**EPR**) for this investigation on Friday 18 September 2026 (seven business days prior to SEF):

- Verification report for Malaysian exporter Dynamic Mesh and Wire Industries Sdn Bhd (**DMW**)
- Verification report for Malaysian exporter Kamen Steel Industries Sdn Bhd (**Kamen**)
- Verification report for importer Australian Steel and Wire Pty Ltd (**ASW**)
- File note of comparative analysis findings for Malaysian exporter Southern Steel Mesh Sdn Bhd (**Southern Steel Mesh**)
- File note of comparative analysis findings for Malaysian exporter Wei Dat Steel Wire Sdn Bhd (**Wei Dat**)

InfraBuild’s review of the five reports listed above has identified a number of questions in relation to the Commission’s treatment of the Malaysian exporters’ data, and the data of the importers of Malaysian mesh. These questions concern the information relied upon for exporter dumping margin calculations and price undercutting analysis for Malaysia. It is particularly important to understand the Commission’s methodology for undercutting analysis applied to all Malaysian and Chinese mesh imports given that there were only two completed importer questionnaire responses received by the Commission but a single importer verification report on the EPR,

¹ Joint application with the Steel Reinforcement Institute of Australia (**SRIA**)



namely for ASW/Jennmar Australia. This is why InfraBuild is seeking clarity in relation to the assessment of Jennmar related entities' channel to market as it may form the basis of all undercutting analysis.

InfraBuild requests that in responding to its questions below, the Commission provide a file note addendum to the reports and file notes, providing further particulars and clarification of the matters identified by InfraBuild in this request.

The Commission's earliest attention to this request for further particulars will ensure that submissions in response to the SEF are informed, and do not require any interested party to speculate on the matters not sufficiently disclosed in the Commission's verification reports and files notes.

1. Summary of findings in the relevant reports for DMW and related importer ASW (for context)

In summary form, InfraBuild identifies the following findings of the Commission in its verification report for the Malaysian exporter and its Australian importer, respectively:

(a) EPR 692/063 Exporter Verification Report for DMW

'During the investigation period, DMW sold the Australian export goods only to the related-party customer ASW' (at [4.4.2.2], p. 11)

'The commission considers Australian Steel & Wire (ASW) is the importer' (at [3.2.2], p. 5)

'...the importer did not purchase the goods at arm's length' (at [3.2], p. 5)

[For DMW] 'export price is the price at which the importer sold the goods, less the prescribed deductions' (at [3.2], p. 5)

'The commission calculated weighted average normal values for DMW based on the normal values ascertained for the other sellers of domestic like goods during the investigation period.' (at [3.3], p. 6)

(b) EPR 692/064 Importer Verification Report for ASW

'ASW mainly purchased mesh from its related entity DMW. ASW also purchased smaller quantities of mesh from unrelated suppliers in China and Malaysia.' (at [1.2.1], p. 4)

'ASW sold the goods to related entity Jennmar Australia during the investigation period.' (at [1.2.2], p. 4)

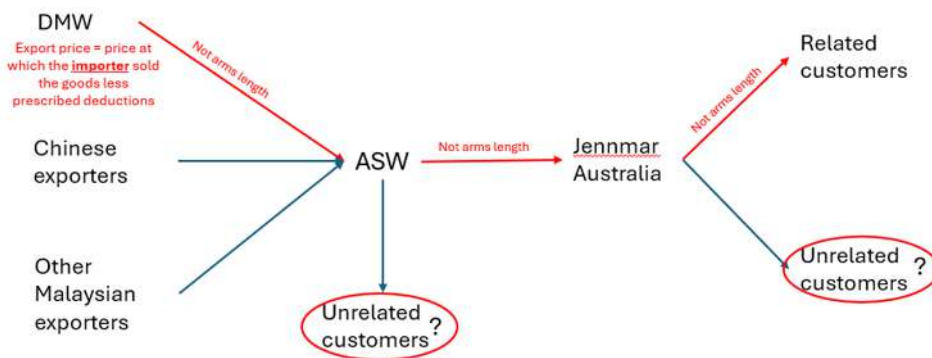
'...sales between ASW and Jennmar Australia were non arms length' (at [7.3], p. 13)

'Jennmar Australia then sold the goods to related and unrelated entities.' (at [1.2.2] at p. 4)

'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' (at [7.3], p. 13)

'The commission assessed the profitability for the following [12] 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.' The Commission found that 3 out of the 12 sales (25%) were unprofitably sold into the Australian market by the importer. (at [7.4], p. 13)

Graphically, InfraBuild summarises its understanding of the Jennmar related entities channel to the Australian market, as reported, as follows:



Question 1: Please clarify whether ASW made sales directly to unrelated customers or whether ASW sold to Jennmar Australia and then Jennmar Australia made the sales to the unrelated customers?

Question 2: Did the Commission consider sales to Australian customers by Jennmar Australia's related customers (for example Jennmar Mesh and Wire Pty Ltd) as arms length sales of the goods into the market?

Question 3: The commission reported relying on the **ASW selling prices** to unrelated customers to calculate profitability but could not *'trace each selected shipment to actual sales transactions'* and instead *'used the quarterly weighted average sales revenue by MCC to assess profitability'*. Given the lack of shipment traceability, was the commission able to exclude the sales of the *'smaller quantities of mesh from unrelated suppliers in China and Malaysia'* also imported by ASW during the period?

Question 4: One-quarter (3 out of 12) of the sales sample tested for profitability was found to be unprofitable. Were the unprofitable sales included in the deductive export price determination for DMW?

Question 5: The list of MCCs imported and sold by ASW are different to those exported by DMW (as per the table below). Which of the MCCs exported by DMW were on-sold by ASW to unrelated entities and used for the export price determination for DMW and which were excluded?

DMW Export MCCs	ASW imports and Australian sales MCCs
P-G-A-S	P-G-A-S
P-G-A-M	P-G-A-M
P-G-A-L	P-G-A-L
P-G-A-XL	P-G-A-XL
	P-G-B-M
	P-N-A-S
P-N-A-M	P-N-A-M
P-N-A-L	P-N-A-L
P-N-A-XL	P-N-A-XL
	P-N-B-S
	P-N-B-XL

2. **DMW Normal Value:**

The Commission ‘*calculated weighted average normal values for DMW based on the normal values ascertained for the other sellers of domestic like goods during the investigation period*’.

There were different MCCs reportedly sold domestically by each of the cooperative exporters. The below table shows the MCCs exported by DMW, the MCCs sold domestically by Kamen (per Kamen’s verification report) and the domestic sales MCCs listed by Southern Steel Mesh and Wei Dat in their responses to exporter questionnaires (**REQ**).

While Wei Dat listed domestic sales of P-G-A-XL and P-G-B-S in their REQ, the Commission found there were ‘no domestic sales’ of these MCCs and applied surrogate MCC models for specification adjustments in the comparative variable factors assessment for this exporter.

Given that the domestic sales MCCs disclosed in Wei Dat’s REQ was found to be different to the actual domestic sales MCCs, InfraBuild requests details of the actual domestic sales MCCs assessed by the Commission as part of the comparative variable factors assessment for Wei Dat and Southern Steel Mesh be included in the file note addendum for transparency.

DMW Export MCCs	Kamen domestic MCCs (verification report)	Southern Steel Mesh domestic MCCs (REQ)	Wei Dat domestic MCCs (REQ)
P-G-A-S	P-G-A-S		P-G-A-S
P-G-A-M	P-G-A-M		P-G-A-M
P-G-A-L			
P-G-A-XL			P-G-A-XL
			P-G-B-S
	P-N-A-S	P-N-A-S	P-N-A-S
P-N-A-M	P-N-A-M	P-N-A-M	P-N-A-M
P-N-A-L	P-N-A-L	P-N-A-L	P-N-A-L
P-N-A-XL	P-N-A-XL	P-N-A-XL	P-N-A-XL
	P-N-B-S	P-N-B-S	P-N-B-S
	P-N-B-M	P-N-B-M	
	P-N-B-L	P-N-B-L	P-N-B-L
	P-N-B-XL	P-N-B-XL	P-N-B-XL
		P-N-C-S	
		P-N-C-M	
	P-N-C-L	P-N-C-L	
	P-N-C-XL	P-N-C-XL	
		P-N-D-S	
		P-N-D-M	
		P-N-D-L	
		P-N-D-XL	

Question 6: Did the Commission use domestic sales of non-galvanised models P-N-A-M, P-N-A-L and P-N-A-XL by Kamen, Southern Steel Mesh and Wei Dat in their Normal Value assessment for DMW or only those MCC sales by verified exporter Kamen?

Question 7: Did the Commission use domestic sales of galvanised models P-G-A-S and P-G-A-M by Kamen and Wei Dat in their Normal Value assessment for DMW? If not, please clarify which sales by which exporters factored into the normal value for DMW for these models of export sales.

Question 8: Which domestic sales did the Commission use for galvanised models P-G-A-L and P-G-A-XL in their Normal Value assessment for DMW? Neither of these models were reportedly sold domestically by the other three exporters. Please provide an explanation of how normal values were determined for these DMW export models, any surrogate models used and the type

of specification adjustments applied (specifically upwards or downwards, not ‘add or deduct’) in the absence of domestic sales by other sellers.

3. Cost to import and sell (CTIS)

InfraBuild summarises the following findings from the Commission’s importer verification report for Jennmar Australia²:

*‘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.**’* (at [6.2], p. 12)

*‘The commission identified that Jennmar Australia had omitted to provide the ASW warehousing costs in relation to the goods.’ ‘**Jennmar Australia provided the costs of warehousing for the various locations, and the commission applied this cost to the unit CTIS.**’* (at [Exception 5], p. 10)

The importer has stated that mine mesh is supplied as part of a “broader ground support package” for mining operations. Their 2025 *Modern Slavery Statement* lists a range of products likely to form part of this ‘broader ground support package’ for mining customers:

‘Our manufacturing portfolio includes steel torque tension bolts, friction bolts, cable bolts, steel bearing plates, steel welded mesh and cement grouts, alongside a full suite of ancillary products and components³.

*‘In Australia, our major manufacturing facilities are located in Sydney and Mackay, plus two facilities in Perth. These plants are supported by **warehouse and distribution centres** strategically positioned in key mining regions including **Broken Hill, Mount Isa, and the Hunter Valley.***

Question 9: Were sales of welded steel mesh as part of a “broader ground support package” for mining operations excluded from the deductive export price methodology?

Question 10: If not, how was the price for sales of welded steel mesh as part of a “broader ground support package” distinguished from the price for other non-goods and services?

Question 11: How was a unit rate of warehouse, delivery costs and SG&A costs calculated? On a revenue or volumes basis? Does the denominator of that calculation include all the revenue or volume of the non-goods? If the denominator was calculated on a revenue basis, was revenue earned from services also included?

² EPR 692/064.

³ <https://www.jennmar.com.au/about/news-and-events/2025-modern-slavery-statement/>

4. Comparative variable factors assessment for Southern Steel Mesh⁴ and Wei Dat⁵

Question 12: For Wei Dat, were the specification adjustments for P-G-A-XL (using P-G-A-M) and for P-G-B-S (using P-G-A-S) additions or deductions? The specification adjustments say ‘add or deduct’. This does not provide interested parties with a reasonable understanding of the information provided such as may facilitate an opportunity to challenge the approach.

Question 13: Why were timing adjustments required for Wei Dat and what were the nature of these adjustments? The timing adjustments say ‘add or deduct’.

Question 14: Packing adjustments were applied for domestic and export packaging for both of these exporters. While export packaging costs for mesh to enable container shipment is understood to be significant, domestic packaging is understood to be minimal (tie wire holding the mesh sheets together). What was the nature of the domestic and export packaging costs claimed?

Question 15: The file notes for both exporters state that they ‘sold a different range of goods to the domestic market compared to the Australian market’. Please clarify - what does that mean?

5. Kamen models and cut-to-size mesh price comparability

In relation to Kamen’s proposal to amend the MCC structure, its verification report states:

‘Kamen Steel proposed an amendment to the MCC structure, in the form of the introduction of an additional subcategory to distinguish between “Cut to Size” and “Not Cut to Size” products ...as “cut-to-size” mesh...consistently attracts a higher price compared to standard mesh’

and finds,

‘After comparing prices of different models of the goods, the commission does not recommend amending the MCC structure’. (at [4.3.1] p. 17)

The report also provides the following details of a downwards adjustment for ‘domestic technical support’ applied to the exporter’s normal value:

‘On the domestic market customised mesh is also supplied for project-specific applications, requiring extensive technical support from Kamen Steel in ascertaining the specification, sizes and quantities of mesh required based on customer architectural drawings.’ (at [3.1.3.3] p.7)

⁴ EPR 692/066.

⁵ EPR692/067.

and,

‘The expense was incurred to support cut-to-size mesh products, which are not sold in the Australian market.

‘The domestic technical support allocation refers to the relevant technical team’s labour cost and printing cost expenses ... allocated by dividing the total technical support expense by the total quantity of cut-to-size goods sold on the domestic market’ (at [3.3.6] p.11)

[with] the quantum of salaries and bonuses paid to the technical sales department ...carved out [from SG&A] and allocated to direct selling expenses in relation to said domestic sales’ (at [4.2.2] p. 16)

Question 16: How was cut-to-size mesh distinguished in the sales listing? Was every mesh sheet other than the standard Malaysian reinforcing mesh sheet of 6m x 2.2m identified as “cut-to-size” mesh?

Question 17: Did the Commission test the price comparability of cut-to-size mesh compared to non cut-to-size mesh to determine the size of the adjustment (if any) needed?

6. Price undercutting analysis for Malaysia

In PAD 692, the Commission has:

‘constructed for the exported goods equivalent DDP selling prices to Australian distributors’

using,

‘importer SG&A and profit for the investigation period for the largest trader in imported steel mesh sheets that provided relevant information in response to the importer questionnaire’,

and confirmed that two complete importer questionnaire responses were received from *‘...Jennmar Australia Pty Ltd and Plascorp Pty Ltd’ (at [1.4] p.4)*

Question 18: Given that Plascorp Pty Ltd (**Plascorp**) provided a complete importer questionnaire response, did the Commission verify Plascorp or perform a comparative assessment of the importer information?

Question 19: Did the Commission use ASW/Jennmar’s SG&A and profit (associated with mesh sheet sales as part of a “broader ground support package” for mining customers) or the SG&A and profit of Plascorp Pty Ltd?



Question 20: Given there were two complete importer questionnaire responses received, why did the Commission need to construct DDP selling prices to Australian customers when the on-sales by the importers would provide DDP selling prices for undercutting analysis?

Question 21: Which two MCCs (called 'MCC 1' and 'MCC 2' in PAD 692) were used for the undercutting analysis for China and Malaysia? This should be made public for the sake of transparency.

Conclusion

As a member of the Australian industry, InfraBuild seeks to make relevant and direct submissions on the material before the Commission. The verification reports and file notes do not permit a reasonable understanding to the extent identified above. We therefore request further particulars of the matters raised, so that we may reasonably assess the material and make meaningful and relevant submissions on the evidence and analysis performed by the Commission.

To discuss any aspect of this submission, do not hesitate to contact your InfraBuild representative on record.

FOR AND ON BEHALF OF

INFRABUILD (NEWCASTLE) PTY LTD

A member of the Australian industry producing like goods