PUBLIC RECORD

The Director, Investigations 1
Australian Trade Remedies Commission
GPO Box 2013
CANBERRA ACT 2601

BY EMAIL:
investigations1@atrc.gov.au

30 October 2026

Dear Director,

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

AUSTRALIAN INDUSTRY POST-SEF RESPONSE TO SUBMISSIONS

InfraBuild (Newcastle) Pty Ltd (**InfraBuild**), an Australian industry applicant[1] 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, responds to the joint submission of Beijing Xingtai Steel Weldmesh & Technology Development Co., Ltd and Tianjin TianKang Metal Products Co., Ltd (**the Exporters**) following the Australian Trade Remedies Commission's (**Commission**) recently published Statement of Essential Facts (**SEF**).

The Exporters' claims concerning material injury caused to the Australian industry as a whole

The Exporters seek to undermine the Commission's assessment of material injury to the Australian industry as a whole in the SEF. In one such example, the Exporters claim:

> The injury case in the investigation period therefore rests on unverified spread figures supplied by members of the joint applicant, one of which had become a reseller, set against verified figures showing that the producer accounting for most of the industry improved.[2]

InfraBuild rejects this assertion, and refers to and repeats the Commission's outline to its *Approach to injury analysis* (at Section 7.2), which not only demonstrates the Commission's understanding of the financial information supplied by SRIA members, but also the methods

[1] Joint application with the Steel Reinforcement Institute of Australia (**SRIA**)
[2] EPR 692/075, p. 9.

the Commission applied to satisfy itself of that data's reliability; the standard required under Australian domestic law.

Furthermore, InfraBuild observes that the Exporters' criticisms only relate to pricing, and completely ignore the Commission's volume findings, which are compelling. For example, the Commission presented its view of "market share" and "share of growth in market"[3], reproduced below:



Figure 10: Investigation period market share v share of growth in investigation period market (%)

Figure 10 is based on verified industry data, which includes InfraBuild and the aggregation of net SRIA member sales of (own) production by the independent auditor acting for the SRIA. We understand that the Commission satisfied itself of the accuracy, relevance and reliability of this data through the various means of verification open to it. Accordingly, the commission was able to satisfy itself of the loss of volume and market share to subject sources (as demonstrated in Figure 10 of SEF 692, above), and concluded injury caused and materiality. Specifically, the Commission found that the share of growth in the market achieved during the investigation period by Chinese mesh exporters at the expense of Australian industry was considered material, not just in volume injury but also in likely price impacts:

> The Commission notes that, across the injury analysis period, imports from China have increased market share from around 5% to 14%, and approximately 30% share of market growth during the investigation period as shown in Figure 10.
>
> ...
>
> The Commissioner considers that China's disproportionate growth in relation to the growth in the market during the during the investigation period was a result for the **price advantage afforded by dumping**. Further, the Commissioner determined in chapter 8.5 that had these goods not been dumped they **would likely have been priced higher than Australian industry's price, thus enhancing the price competitiveness of Australian industry and likely leading to those sales being captured by Australian industry rather than Chinese imports**.
>
> ...

[3] SEF 692, Figure 10, p. 91.

> The Commissioner considers that had Australian industry **retained the additional 1% share of the market that was captured by dumped Chinese imports during the investigation period Australian industry would have increased its revenue by an estimated $8 million**. The Commission notes that this figure does not reflect Australian industry recapturing additional market share, nor achieving an increase in selling prices, and is therefore considered **a conservative estimate**.
>
> ...
>
> Had Australian industry reclaimed market share to the levels observed in YE September 2021, it is estimated that Australian industry revenue would have been around $80 million higher (assuming the same pricing as observed during the investigation period).[4]

In other words, in the case of China, the dumped prices facilitated this growth and for Malaysia, the pricing uncertainty on Chinese mesh created by *Anti-circumvention Inquiry No. 643* provided some impetus for importers temporarily switching supply from China to Malaysia, indeed on this last point, the Commission observed:

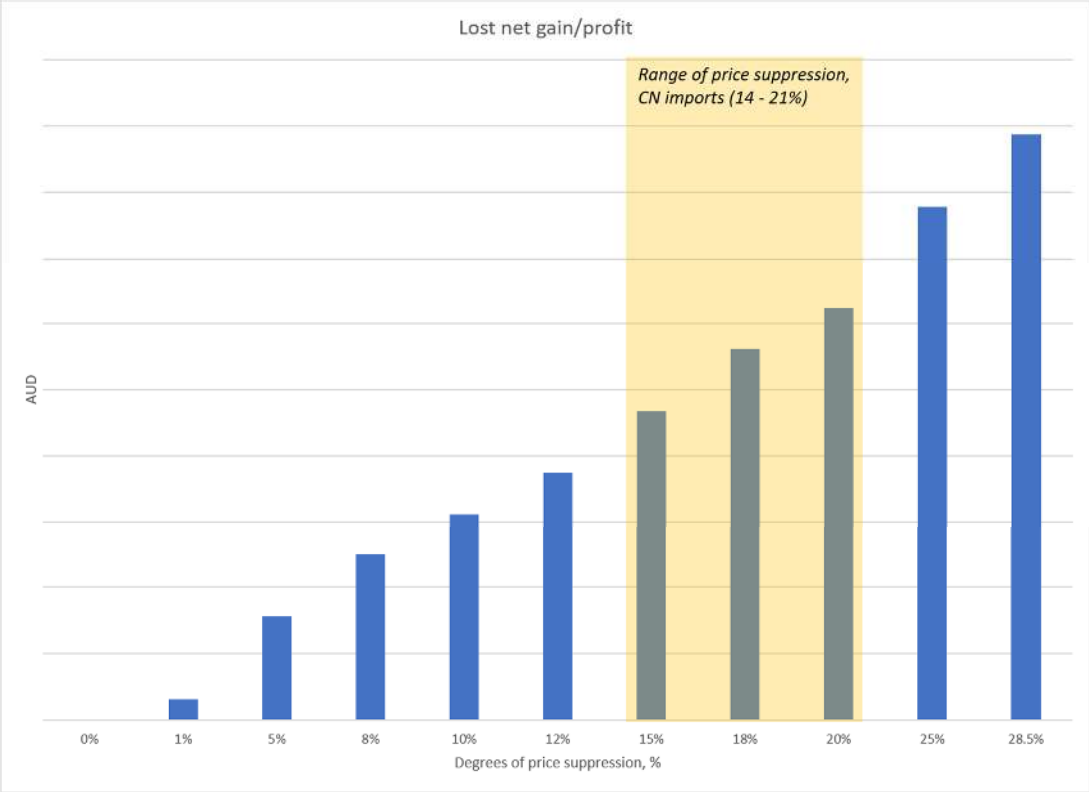
> The Commissioner considers that once the threat of measures being imposed on steel mesh sheets exported from China as a result of INQ 643 had dissipated, importers once again preferred imports of the goods from China over Malaysia.[5]

The materiality of price injury to InfraBuild, alone

Given the Commissioner's determination in chapter 8.5 that had these goods not been dumped they **would likely have been priced higher than Australian industry's price, thus enhancing the price competitiveness of Australian industry and likely leading to those sales being captured by Australian industry rather than Chinese imports**, it follows that the Australian industry also experienced price injury in terms of price suppression. To demonstrate the materiality of price suppression to InfraBuild alone, a conservative scale of degrees of price suppression have been calculated as a means of assessing the counterfactual, i.e. if not for the dumped imports what would InfraBuild's price/value performance have been? The impact of that price suppression on lost revenue, i.e. net gain, and lost profitability is presented below.

Degree of price suppression, %		0%	1%	5%	8%	10%	12%	15%	18%	20%	25%	28.5%
net sales revenue	$											
unit sales revenue (K/G)	$											
net gain or loss (K-H-[G*F])	$											
unit gain or loss (M/G)	$											
profitability (N/L%)	%											
Lost revenue/net gain		-										
Lost profitability		0.0%										

[4] SEF 692, pp. 96 - 97.
[5] SEF 692, p. 93.



Source: CONFIDENTIAL ATTACHMENT 1 (based on verified appendix A6.1, InfraBuild, investigation period, 12-me 31 September 2025).

If the degree of price suppression reflected the lowest verified dumping margin of 28.5% for the named exporter from China, then on InfraBuild's analysis this has had a price effect of almost $[redacted] million of lost revenue, and [redacted] percentage points of lost profitability. If a conservative assessment of the degree of the price effects of the dumped imports from China on InfraBuild's selling prices alone, were based on the range of price undercutting by Chinese imports in the Australian market (14 – 21%),[6] then the value of lost revenue would range between $[redacted] million and $[redacted] million. The materiality of the price effects in the form of lost revenue, margin and profitability are material accounting for between [redacted] % and almost [redacted] % of InfraBuild's realised net revenue in the investigation period.

In other words, the price effects of the dumped imports on InfraBuild, alone, were material and injurious, in and of themselves.

Observations arising from export statistics following the publication of PAD 692

InfraBuild encloses for the Commission's review, its latest export trade statistics showing the volume and value of welded mesh sheets exported from China to Australia in the month of September, and for Malaysia exported in the month of August.[7] The publication of PAD 692 has

[6] SEF 692, p. 90.
[7] CONFIDENTIAL ATTACHMENT 2.

provided much needed relief to Australian mesh manufacturers from the ever-increasing volumes of dumped mesh, of Chinese origin in particular, that has arrived in the market in recent months. To ensure that the relief afforded to the Australian industry as a whole by the taking of securities in respect of any interim duty that may become payable on the goods and like goods under the *Dumping Duty Act*, InfraBuild requests that the relevant dumping duty notice be published within the prescribed period under paragraph 45(3)(b) of the *Customs Act* (4 months) to give effect to the conversion of those securities to interim duties.

Conclusion

Accordingly, InfraBuild submits that the Exporters' criticisms of the Commission's injury analysis fail to engage with the verified evidence before the Commission, particularly the significant volume effects, loss of market share and the substantial price suppression caused by the dumped imports.

The Commission's findings demonstrate that dumped imports secured a disproportionate share of market growth, displaced Australian production, and materially impaired the revenue and profitability of the Australian industry. InfraBuild's own analysis further confirms that the price effects alone were significant, material and injurious. The evidence contained in SEF 692, together with the most recent export statistics, supports the conclusion that the dumping of welded steel mesh sheets from China has caused material injury to the Australian industry and that the injury would likely continue in the absence of effective measures.

InfraBuild is conscious that the timely conclusion of this investigation will give full effect to the securities taken to date and help afford the intended relief from the injury being caused by dumped imports to the Australian industry as a whole.

To discuss any aspect of this submission, please 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