PUBLIC RECORD

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

BY EMAIL:
investigations1@atrc.gov.au

11 November 2026

Dear Director,

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

RESPONSE TO CLAIMS OF COST IMPACTS FROM MESH MEASURES

InfraBuild (Newcastle) Pty Ltd (**InfraBuild**) is 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. This submission responds to claims made by interested parties regarding the impact of the proposed measures on housing and construction costs and sets out why those claims are unsupported and should be given limited consideration.

Impact of Measures on Housing and Construction Costs

The Commission received submissions from an anonymous importer[2] and from Urban Taskforce Australia[3] asserting that the proposed measures would materially increase housing construction costs, threaten project feasibility and adversely affect housing affordability. These claims are unsupported by evidence and significantly overstate the likely impact of any measures.

Neither submission provides any quantitative assessment demonstrating the extent to which the proposed duties would affect the cost of constructing a dwelling, apartment building or commercial project. Rather, the submissions rely on broad assertions that duties on steel mesh would increase construction costs and render projects unviable.

Assuming, for the sake of argument, that any anti-dumping duties imposed on imports from China were passed through in full by importers and distributors to end users, the resulting impact on construction costs would be negligible.

[1] Joint application with the Steel Reinforcement Institute of Australia (**SRIA**)
[2] EPR 692/079.
[3] EPR 692/080.

Based on the Commission's lowest proposed dumping margin for China of 28.5 per cent and an estimated FOB export price of approximately AUD [redacted] per tonne, the additional cost attributable to dumping duties would be approximately AUD [redacted] per tonne:

> AUD [redacted]/t × 28.5% = AUD [redacted]/t

A typical detached dwelling requires approximately two tonnes of reinforcing mesh. On this basis, the total additional cost attributable to anti-dumping measures would be approximately AUD [redacted] per dwelling:

> 2 tonnes × AUD [redacted]/t = AUD [redacted]

Against an indicative new home construction cost of AUD 500,000, this equates to approximately [redacted] [*<0.1*] per cent of total build costs:

> AUD [redacted] ÷ AUD 500,000 = [redacted] [*<0.1*] %

Accordingly, even under the highly conservative assumption of complete pass-through, anti-dumping measures would increase the cost of constructing a typical home by less than one-tenth of one per cent.

Importantly, this estimate overstates the likely effect because it assumes:

- the use of imported Chinese mesh in the project;
- full pass-through of any duties by importers and distributors;
- no substitution to Australian-produced mesh or imports from other sources; and
- no competitive response by suppliers.

The estimated impact should therefore be regarded as an upper-bound scenario rather than a likely outcome.

The very small magnitude of the estimated increase demonstrates that the submissions' claims regarding housing affordability and project feasibility are not supported by the available evidence. A cost increase of approximately AUD [redacted] on a AUD 500,000 home construction cost is **immaterial** when compared with normal fluctuations in land costs, labour costs, concrete prices, financing costs, statutory charges and other construction inputs. The evidence does not support a conclusion that such an increase would materially affect home ownership affordability, development feasibility or housing supply. In contrast, the Commissioner's preliminary findings in this investigation confirm that for the Australian mesh industry, *the level of injury experienced across the multiple injury indicators caused by imports of dumped goods…**is material***[4].

The submission from Urban Taskforce Australia provides no evidence to substantiate its assertions that projects would become "unfeasible" or that duties would have a significant effect on housing affordability. No project feasibility analysis, cost modelling, quantity surveying evidence or economic assessment has been provided in support of these claims.

The anonymous importer submission also contends that duties would impose significant costs on downstream users and the broader economy. However, when the actual cost impact is quantified, it becomes apparent that the effect on end users is extremely small. While steel

[4] SEF 692, p. 97.

mesh is an important construction input, it constitutes only a minor component of total construction costs. Consequently, even substantial movements in mesh prices translate into only marginal changes in overall project costs.

The submissions argue for a public interest test

The submissions from the importer and Urban Taskforce Australia focus primarily on alleged impacts on housing affordability, construction costs, project feasibility and broader economic outcomes. These arguments are, in substance, public interest considerations.

Such matters may be a relevant consideration in a Safeguard Inquiry where the remedy is applied in a global context and a finding of dumping is not required. However, the legislative task before the Commission in this dumping investigation is to determine whether the statutory criteria for the imposition of measures have been satisfied, including whether goods have been dumped and whether that dumping has caused material injury to an Australian industry.

Accordingly, while the Commission may note the concerns raised by downstream users, those concerns do not provide a basis for declining to impose measures where the statutory requirements have otherwise been established. The submissions should therefore be afforded limited weight insofar as they seek to invite the Commission to undertake a balancing exercise based on public interest considerations that are not required in an anti-dumping investigation.

Conclusion

The claims advanced by downstream users should be dismissed as both unreliable and irrelevant to the statutory considerations for the Commissioner to recommend to the Minister. The available evidence indicates that any increase in construction costs arising from anti-dumping measures would be negligible in percentage terms and unlikely to have any material effect on housing affordability, project feasibility or construction activity. In contrast, the available evidence concerning injury to Australian industry caused by dumped mesh imports has been assessed by the Commission to be material. The most effective means to remedy the injurious effect of dumping is to apply the measures as determined and restore competition between Australian industry and imported goods on a level playing field.

Accordingly, the submissions do not provide a reasonable basis for concluding that measures should not be imposed.

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