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Australian Trade Remedies Commission
Investigations 3
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**Public File**

**Investigation No. 723 – Glass wool insulation batts exported from the People's Republic of China and Malaysia**

The Insulation Council of Australia and New Zealand (**ICANZ**) welcomes the Commissioner's decision to accept the application lodged by CSR Building Products Ltd (CSR) and Fletcher Insulation Pty Ltd (Fletcher), and to initiate an investigation into glass wool insulation batts exported to Australia from China and Malaysia (Trade Remedies Notice No 2026/152). ICANZ writes in support of the investigation.

**About ICANZ**

ICANZ is the industry body for manufacturers of mineral fibre insulation in Australia and New Zealand. Its members include CSR Bradford and Fletcher Insulation, the two Australian manufacturers of Glasswool insulation batts. Fletcher's Pink Batts and CSR's Bradford insulation brands have been used in Australian buildings since the 1950's.

Insulation is one of the most cost-effective ways to improve the energy efficiency of buildings and reduce energy use and carbon emissions. ICANZ works with Governments, regulators, building professionals and consumers on:

- the development of codes and standards, including the energy efficiency provisions of the National Construction Code;
- the installation of bio-soluble mineral fibre insulation and good installation practice, including installer training; and
- research and information on the energy, cost and emissions benefits of insulation.

**Support for the investigation**

ICANZ supports the initiation of Investigation 723. The Commissioner's consideration report sets out a clear basis for it:

- Australian industry: CSR and Fletcher account for 100 percent of Australian production of like goods.

- Dumping: using ABF import data, the Commissioner estimated dumping margins of 69.4 percent for China and 57.3 percent for Malaysia. Dumped volumes from both countries are above negligible levels.

- Subsidisation: there appears to be reasonable grounds that exporters in both countries received countervailable subsidies. For China, these include silica sand, soda ash, borax and electricity provided for less than adequate remuneration, as well as grants, tax preferences, preferential loans and export subsidies. For Malaysia, they include grants, preferential lending and tax incentives, some publicly disclosed by a major Malaysian exporter.

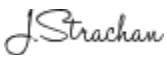
- Injury: The Commissioner found reasonable grounds for price suppression, reduced profit and profitability, and declines in asset values, capital investment and research and development, and has assessed this injury as material on a preliminary basis.

- Causation: the injury coincided with growth in dumped and subsidised imports from China and Malaysia.

These findings are consistent with ICANZ's understanding of conditions in the Australian market. A strong local manufacturing base supports reliable supply, product development for Australian conditions and the industry's investment in standards, training and safe and professional installation. When prices cannot keep pace with rising costs, there is less room for that investment. ICANZ therefore considers it important that the investigation proceeds and that the effect of dumped and subsidised imports is fully examined.

ICANZ is at the Commission's disposal throughout the investigation.

Yours sincerely,



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