PUBLIC FILE

Application for the publication of

dumping and/or

countervailing duty notices

Autoclaved Aerated Concrete

Exported from People's Republic of China

September 2026

APPLICATION UNDER SECTION 269TB OF THE *CUSTOMS ACT 1901* FOR THE PUBLICATION OF DUMPING AND/OR COUNTERVAILING DUTY NOTICES

DECLARATION

I request, in accordance with section 269TB of the *Customs Act 1901* (the Act)[1], that the Minister publish in respect of goods the subject of this application:

☐ a dumping duty notice, or

☐ a countervailing duty notice, or

☒ a dumping and a countervailing duty notice.

This application is made on behalf of the Australian industry producing like goods to the imported goods the subject of this application. The application is supported by Australian producers whose collective output comprises:

- 25% or more of the total Australian production of the like goods; and
- more than 50% of the total production of like goods by those Australian producers that have expressed either support for, or opposition to, this application.

I believe that the information contained in this application:

- provides reasonable grounds for the publication of the notice(s) requested; and
- is complete and correct.

Please note that giving false or misleading information is a serious offence.

Signature: [**sgd**]

Name:	[redacted]
Position:	[redacted]
Company:	CSR Building Products Limited
ABN:	55 008 631 356
Date:	30 September 2026

[1] All legislative references are to the *Customs Act 1901*.

IMPORTANT INFORMATION

About this form

Section 269TB(4)(b) of the Act requires that an application under section 269TB of the Act for publication of a dumping duty notice or a countervailing duty notice must be in a form approved by the Commissioner under section 269SMS(1) for those purposes. This is the approved form.

Signature requirements

Where the application is made:

By a company - the application must be signed by a director, servant or agent acting with the authority of the body corporate.

By a joint venture - a director, employee, agent of each joint venturer must sign the application. Where a joint venturer is not a company, the principal of that joint venturer must sign the application form.

On behalf of a trust - a trustee of the trust must sign the application.

By a sole trader - the sole trader must sign the application.

In any other case - contact the Anti-Dumping Commission's (the commission's) Client support section for advice.

NB: Where an application is made by an agent acting with authority on behalf of a company, joint venture, trust or sole trader, an authority to act letter must be provided with this application.

Assistance with the application

The commission provides a free-of-charge document checking service, available prior to formal lodgement, to assist applicants to ensure that their applications meet the documentary requirements, see "before you apply": https://www.industry.gov.au/anti-dumping-commission/apply-anti-dumping-or-countervailing-duties-measures

The commission has also published guidelines to assist applicants with the completion of this application: https://www.industry.gov.au/anti-dumping-commission/apply-anti-dumping-or-countervailing-duties-measures

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 Department of Industry, Science and Resources' the International Trade Remedies Advisory (ITRA) Service. For more information on the ITRA Service, visit www.business.gov.au/ITRA, email us at itra@industry.gov.au, or telephone the ITRA Service Hotline on +61 2 6213 7267.

The Commission's client support section can also provide information about dumping and countervailing procedures and the information required by the application form. Contact the team on:

Phone: 13 28 46 or +61 2 6213 6000 (outside Australia)
Email: clientsupport@adcommission.gov.au

Further information is available from the Commission's website at www.adcommission.gov.au.

On page 27 of this application form, the commission lists the appendices referenced in different questions in the form. These appendices should be used to supply information for an application for the publication of dumping and/or countervailing duty notices and can be accessed on the commission's website, here: B108 Appendices

Important information

To initiate an investigation into dumping and/or subsidisation, the commission must comply with Australia's international obligations and statutory standards. This form provides an applicant industry with a framework to present its case and will be used by the commission to establish whether there appear to be reasonable grounds for the publication of a dumping duty or countervailing duty notice and initiate an investigation. To assist consideration of the application it is therefore important that:

- all relevant questions are answered; and
- information that is reasonably available be supplied.

The commission does not require conclusive evidence to initiate an investigation, but any claims made should be reasonably based. An application will be improved by including supporting evidence and where the sources of evidence are identified. Simple assertion is inadequate to substantiate an application.

To facilitate compilation and analysis, the application form is structured in 3 parts:

- **Part A** seeks information about the Australian industry. This data is used to evaluate industry trends and assess claims of material injury due to dumping/subsidisation. Where an Australian industry comprises more than one company, each should separately prepare a response to Part A to protect commercial confidentiality.
- **Part B** relates to evidence of dumping.
- **Part C** is for supplementary information that may not be appropriate to all applications. However some questions in Part C may be essential for an application, for example, if action is sought against subsidisation.

All questions in Parts A and B must be answered, even if the answer is 'Not applicable' or 'None'. Where appropriate, applicants should provide a short explanation about why the requested data is not applicable. This will avoid the need for follow up questions by the commission.

The application form does not specifically address all the information required when making a claim that the establishment of an Australian industry producing like goods has been or may be materially hindered. If you are considering making such a claim, please contact the commission to discuss information requirements.

The application form requests data over several periods (P^1, P^2….P^n) to evaluate industry trends and to correlate injury with dumped or subsidised imports. The labels P^1…P^n are used for convenience in this application form. Lodged applications should identify the period relevant to the data. This form does not specify a minimum period for data provision. However, sufficient data must be provided to substantiate the claims made. If yearly data is provided, this would typically comprise a period of at least four years (for example the current financial year in addition to three prior years). Where information is supplied for a shorter period, applicants may consider the use of quarterly data. Data must also be sufficiently recent to demonstrate that the claims made are current.

When an investigation is initiated, the commisison will verify the claims made in the application. A verification visit to the Australian industry usually takes several days.

Applicants should be prepared to substantiate all Australian industry financial and commercial information submitted in the application. Any worksheets used in preparing the application should therefore be retained to facilitate verification.

During verification, the commisison will examine company records and obtain copies of documents relating to the manufacture and sale of the goods.

Appendices

Some questions require attachments to be provided. The attachment numbering sequence should refer to the question answered. For example, question A2.2 requests a copy of an organisation chart. To facilitate reference, the chart should be labelled Attachment A2.2. If a second organisation chart is provided in response to the same question, it should be labelled Attachment A2.2.2 (the first would be labelled Attachment A2.2.1).

Provision of data

Industry financial data must, wherever possible, be submitted in an electronic format.

- The data should be submitted on a media format compatible with Microsoft Windows.
- Microsoft Excel, or an Excel compatible format, is required.
- If the data cannot be presented electronically please contact the Commission's client support section for advice.

Lodgement of the application

This application, together with the supporting evidence, must be lodged in the manner approved by the Commissioner under subsection 269SMS(2) of the Act. The Commissioner has approved lodgement of this application by:

(i) email, preferably, using the email address clientsupport@adcommission.gov.au

(ii) upload to SIGBOX (SIGBOX is our secure online lodgement platform, suitable for large files or attachments - email us to arrange access), or

(iii) post to:
The Commissioner of the Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

As currently applied:

- Applications are taken to be lodged or received by the Commissioner when it is first received by a commission staff member doing duty in relation to applications.
- Staff members are taken to be on duty receiving applications from 9:00am to 5:00pm (AEST or AEDST) on business days that are not an Australian Capital Territory public holiday, or during Annual Closedown*.

Definitions in this application:

1. ***AEST*** means Australian Eastern Standard Time.
2. ***AEDST*** means Australian Eastern Daylight Savings Time.
3. ***business day*** means a day that is not a Saturday or Sunday.
4. ***Annual Closedown*** means the 3 business days the Commission is closed between Christmas Day and New Year's Day.

* Public holidays are listed at: https://www.fairwork.gov.au/employment-conditions/public-holidays

Public Record

During an investigation all interested parties are given the opportunity to defend their interests by making a submission. The commission maintains a public record of these submissions. The public record is available on the commission's website at www.adcommission.gov.au.

At the time of making the application both a confidential version (for official use only) and non-confidential version (public record) of the application must be submitted. Please ensure each page of the application is clearly marked "FOR OFFICIAL USE ONLY" or "PUBLIC RECORD". The non-confidential application should enable a reasonable understanding of the substance of the information submitted in confidence, clearly showing the reasons for seeking the publication of a dumping duty or countervailing duty notice, or, if those reasons cannot be summarised, a statement of reasons why a summary is not possible.

PART A

INJURY

TO AN AUSTRALIAN INDUSTRY

IMPORTANT

All questions in Part A should be answered even if the answer is 'Not applicable' or 'None'. If an Australian industry comprises more than one company/entity, each should separately complete Part A.

A-1 Identity and communication

Please nominate a person in your company for contact about the application:

Contact Name:	[redacted]
Company and position:	[redacted]
Address:	39 Delhi Road, North Ryde, New South Wales, 2113
Telephone:	[redacted]
E-mail address:	[redacted]
ABN:	55 008 631 356

Alternative contact

Name:	[redacted]
Position in company:	[redacted]
Address:	39 Delhi Road, North Ryde, New South Wales, 2113
Telephone:	[redacted]
E-mail address:	[redacted]

If you have appointed a representative to assist with your application, provide the following details and complete Appendix A8 (Representation).

Name:	Chad Uphill
Business name:	Chad Uphill Trade Advisory
Address:	P.O. Box 3004, Minnamurra, NSW 2533
Telephone:	+61 2 412 377 603
E-mail address:	chad@cutrade.com.au
ABN:	31 207 328 729

A-2 Company information

1. State the legal name of your business and its type (e.g. company, partnership, sole trader, joint venture). Please provide details of any other business names you use to manufacture/produce/sell the goods that are the subject of your application.

The legal name of the applicant entity to this application is CSR Building Products Limited (**CSR** and/or **the Australian industry**). This entity is the legal entity under which the ***Hebel*** business operates. The Hebel business manufactures the Australian like autoclaved aerated concrete (**AAC**) products.

2. Provide your company's internal organisation chart. Describe the functions performed by each group within the organisation.

Refer Confidential Attachment A-2.2.

3. List the major shareholders of your company. Provide the shareholding percentages for joint owners and/or major shareholders.

Compagnie de Saint-Gobain S.A. (**Saint-Gobain**) is the ultimate parent of CSR Building Products Limited. [***Confidential text deleted:*** *ownership details*].

4. If your company is a subsidiary of another company list the major shareholders of that company.

[***Confidential text deleted:*** *ownership details*].

5. If your parent company is a subsidiary of another company, list the major shareholders of that company.

Refer responses above at A-2.2/A-2.3/A-2.4.

6. Provide an outline diagram showing major associated or affiliated companies and your company's place within that structure (include the ABNs of each company).

Confidential Attachment A-2.2 provides diagrammatically the associated/affiliated companies to CSR Building Products Limited. Relevant ABN/ACN details are as follows:

[*Confidential table deleted:* *entity names and ABN's/ACN's*].

7. Are any management fees/corporate allocations charged to your company by your parent or related company?

[*Confidential text deleted:* *corporate management fee details*].

8. Identify and provide details of any relationship you have with an exporter to Australia or Australian importer of the goods.

[***Confidential text deleted:*** *exporter/importer relationships*].

9. Provide a copy of all annual reports applicable to the data supplied in appendix A3 (Sales Turnover). Any relevant brochures or pamphlets on your business activities should also be supplied.

Refer Confidential Attachments A-2.9.1 and A-2.9.2.

10. Provide details of any relevant industry association.

There are no AAC-relevant Australian industry bodies or associations. CSR is, however, involved with the following building industry organisations:

- The Housing Industry Association (HIA);
- The Master Builder Association (MBA);
- ThinkBrick;
- Bricklayer Contractors Australia;
- Australian Roof Tile Association (ARTA); and
- Concrete Masonry Association (CMAA).

A-3 Industry support requirements (standing)

It is a requirement that your application is supported by a sufficient part of the Australian industry who produce or manufacture like goods in Australia. This means Australian producers or manufacturers (including you as the applicant) whose collective output comprises:

- 25% or more of the total Australian production of the like goods; and
- more than 50% of the total production of like goods by those Australian producers that have expressed either support for, or opposition to, your application.

1. Complete appendix A1 (Australian production) to identify all known Australian producers or manufacturers (including the applicant) of like goods. Confirm the application is supported by a sufficient part of the Australian industry.

- Where production volumes are not available, provide estimates.
- Include evidence that producers or manufacturers support or oppose an application.

Refer Appendix A1. CSR comprises 100 percent of the Australian industry producing like goods.

A-4 The imported and locally produced goods

Questions 1 - 3 refer to the imported product the subject of your application. These are known throughout an investigation as 'the goods under consideration' or 'the goods'. Question 4 refers to your production that is known as 'like goods'.

1. What are the goods the subject of your application?
    - Provide a concise description of the physical characteristics of the goods as it would appear at the place of import in Australia.
    - This concise description will be used to assess the goods subject to the application throughout the investigation and in imposing measures if a dumping or countervailing duty notice is published.
    - If certain physical characteristics are intended to be excluded from the goods subject to the application, provide details of these characteristics.

The goods the subject of the application are autoclaved aerated concrete (AAC) blocks or panels, of a minimum thickness of 30 millimetres, of a width not exceeding 620 millimetres, and of lengths up to and including 6,000 millimetres (inclusive), whether finished or unfinished, of any density, edge profile or face treatment, and in the case of panels, whether or not reinforced with steel or other materials.

The goods do not include concrete blocks or panels not manufactured through the autoclaved aeration process.

2. Provide any further details of the goods that would assist in identifying whether a product is the subject of your application:
    - Include physical, technical or other properties not already mentioned in question 1.
    - Where the application covers a range of products, list this information for each make and model in the range.
    - Supply technical documentation where appropriate.

AAC is a lightweight, precast, cellular concrete building material manufactured by mixing lime, cement, fine aggregate (typically sand or fly ash), aluminium paste, and water into a slurry. The aluminium powder reacts to create hydrogen gas, forming evenly distributed air cells throughout the mixture. The material is then cut to size and cured in an autoclave under high pressure and steam, creating a dimensionally stable product with a characteristic cellular structure.[2]

This manufacturing process gives AAC a recognisable identity across the range of goods: a lightweight, closed-cell cellular concrete, of substantially lower density than normal-weight (dense) concrete, that can be cut and worked with hand tools and that exhibits a porous structure on any cut face. The goods differentiate from one another principally by their form, and secondarily by variations within each form, as described below. A copy of CSR's product guide is at Non-Confidential Attachment A-4.2.

Key distinguishing characteristics

The primary characteristic distinguishing the goods is their form. AAC is supplied in block

[2] Refer Non-Confidential Attachment A-4.2: Hebel Product Guide.

and panel form:

- AAC blocks are small-format, discrete masonry units of solid, unreinforced AAC. They are laid in courses and bedded in adhesive or mortar and are worked in the same manner as traditional masonry. In CSR's range, the blocks share a common 600mm module and are supplied in thicknesses from 50 mm to 300 mm.[3]

- AAC panels are large-format, steel-reinforced spanning elements. They are 600mm wide as standard and are supplied in lengths from 1,200mm upwards. Panels are installed as whole elements. They are fixed vertically to timber or steel framing by means of top hats, brackets and screws, laid over joists, or supported on shelf angles as a facade. The embedded steel reinforcement gives a panel the bending and handling capacity that a block does not possess.

Within the panel form, products differ by certain secondary variations:

- reinforcement configuration, where steel reinforcement embedded within the AAC. In panel manufacture, welded steel mesh is placed in the mould, and given an anti-corrosion coating, before the slurry is poured. The reinforcement provides the panel's spanning capacity and handling capability.

  The types of reinforcement are single mesh (a single mesh mat, used in standard panels) and caged or double mesh (two mats forming a cage, used in taller panels, in load-bearing floor panels, and in commercial and civil products). Blocks contain no reinforcement;

- density grade: a standard density, and a lower-density grade (designated "XL") that is lighter and used in low-rise residential construction;

- edge profile: square edge (for rendered facades and intertenancy walls), tongue-and-groove (interlocking, for internal walls and floors), offset tongue-and-groove, and a load-bearing floor profile;

- face treatment: a plain surface, or a surface pre-routed with decorative linework or patterns; and

- dimensions: thickness and length within the ranges noted above.

Goods in the marketplace

AAC can be identified by its low density, the fine closed-cell porous structure visible on any cut face, the ability to cut and rout the material with hand tools, and its reference to autoclaved aerated concrete or the applicable AAC standard. These characteristics distinguish AAC from dense precast concrete, fibre-cement sheet and other lightweight concretes that are not autoclaved and aerated.

AAC blocks are small discrete units containing no reinforcement.[4] AAC panels are large-

[3] For example, PowerBlock 600 × 200 × 50 through to 600 × 200 × 300, together with a 600 × 400 × 100 unit and a custom 1,200 × 300 × 300 unit: see the PowerBlock product-sizes table in Attachment A-4.2.

[4] A 'sill' is not a discrete product. It is an AAC block supplied for a windowsill end-use. It is the same solid, unreinforced AAC material, in the same block footprint, as CSR's other blocks, differing only in that it is designated and packaged as a sill. It falls within the AAC blocks limb of the goods description. It appears in the product guide but not in the body of this application on the basis that the application describes the goods by form; a sill is one application of a block and does not require separate treatment.

format elements containing embedded steel mesh, identifiable at the cut ends.

Applications

The primary applications of the goods are:

- wall panels: external rendered walls, intertenancy walls, zero and dual-zero boundary walls, high-rise facades, balcony blades, corridor, shaft and service walls, fencing, sound barriers and fire walls; and

- floor panels: suspended ground floors and mid-floors, including a 75 mm tongue-and-groove floor panel laid over joists (non-load-bearing) and a thicker caged floor panel that is load-bearing and spans without joists.

Finishes

The terms “finished” and “unfinished” refer to the state of processing of the raw AAC surface.

“Finishing” includes the use of advanced wire-cutting machinery capable of producing a smooth concrete-like, crumble-free raw surface, and further secondary factory processes – (such as routing, pressing and linishing) that emboss the raw AAC surface with features such as routed linework, pressed stone-like patterns and surface textures. The product remains the usual grey-white colour of raw AAC and, as sold, is not yet ready to be exposed as a finished cladding.

For AAC blocks, advanced finishing includes not only making the block surfaces smoother and more refined, but also the addition of installation aids (such as integral pocket rebates that make manual handling of the blocks easier) through to the machining of a basic cubic block into a ready-to-use building component, such as a curved, shaped or rebated element.

An “unfinished” product is one that has not been subjected to such surface finishing or secondary machining.

3. List the tariff classification(s) and statistical code(s) of the imported goods.

Subject good imports are classified to the following tariff classification and statistical codes:

Tariff classification	Statistical code	Description
6810.11.00	10	Building Blocks and Bricks of artificial stone
6810.91.00	13	Prefabricated Structural Components for Buildings or Civil Engineering of Cement Concrete or Artificial Stone

4. Fully describe your product(s) that are 'like' to the imported product:
    - Include physical, technical or other properties.
    - Where the application covers a range of products, list this information for each make and model in the range.
    - Supply technical documentation where appropriate.
    - Indicate which of your product types or models are comparable to each of the imported product types or models. If appropriate, the comparison can be done in a table.

The AAC goods produced by CSR are manufactured under the Hebel brand at CSR's Somersby, NSW plant. The Australian-produced goods and the imported goods are alike in all material respects: they share the same physical composition and manufacturing process, are produced to and certified against the same Australian Standards, perform the same function in the same building applications, and are sold into the same market through the same distribution channels and to the same customers.

Composition and manufacture

The Hebel range is manufactured, tested and certified in accordance with AS/NZS 4456 series (masonry test methods), AS 5146 series (reinforced AAC design and construction), AS 1530.4 (fire resistance), AS/NZS 1276.1 / ISO 717.1 (airborne sound), AS/NZS 4859.1 (thermal), AS 4055 (wind classification) and AS 3959 (bushfire)], and holds CodeMark certification. The imported goods are certified against the same Australian Standards for the purpose of demonstrating compliance with the National Construction Code (**NCC**). This is necessarily as the imported goods could not otherwise be specified in Australian construction.

CSR range

The three Hebel models set out below account for approximately [*XX*] percent of CSR's AAC sales in the applications where the imported goods compete. The physical and technical specifications of each model (thickness, dry density, compressive strength, weight, thermal resistance, acoustic performance, fire resistance level, wind classification and bushfire attack level) are provided at Confidential Attachment A-4.4.

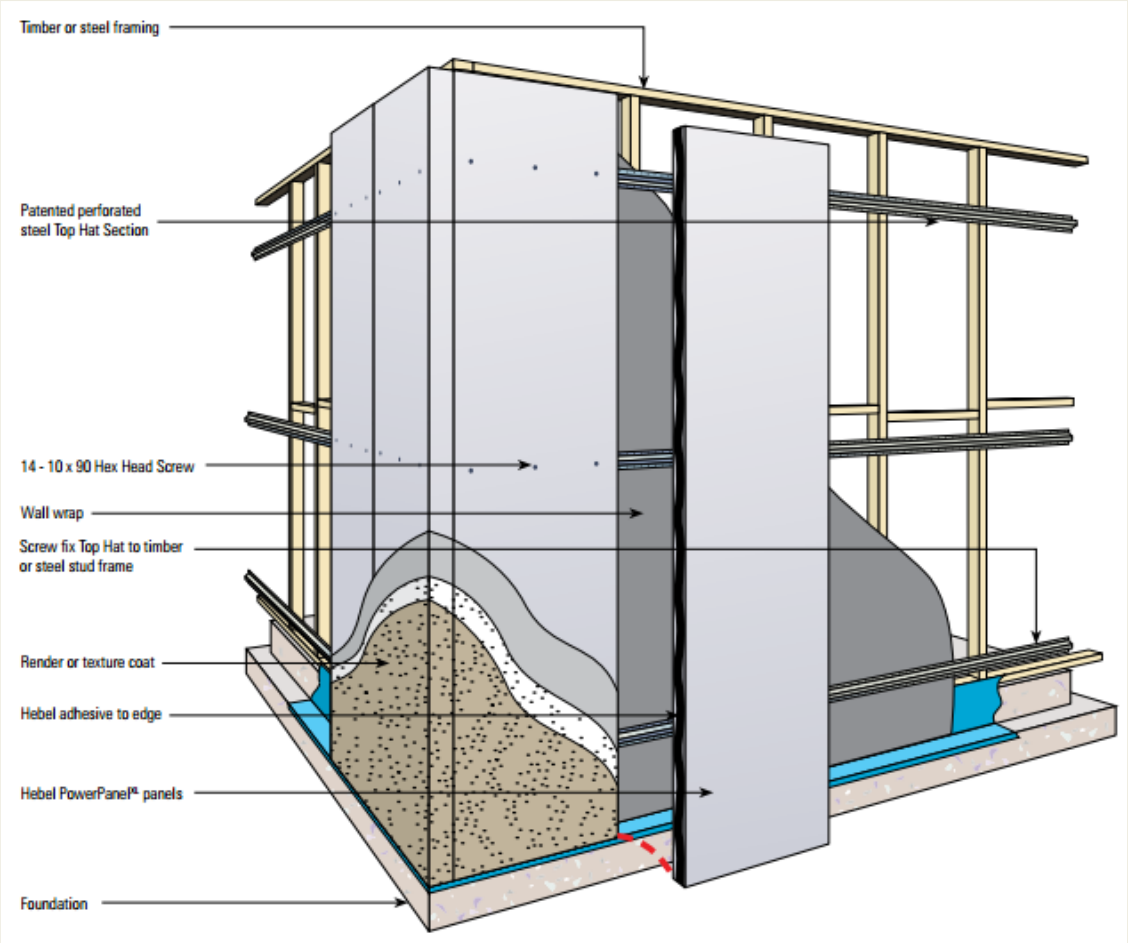
Comparability to imports

The product specification comparison at Confidential Attachment A-4.4 compares Australian industry goods to the imported Chinese models, matched on nominal thickness and application. In summary:

Application	CSR model	Comparable imported models
External wall panel, 50mm (thickness)	Hebel PowerPanel 50	Helix Panels 50, Eastland External Wall 50, Hardie Gravis Wall 50, Nasahi Super50
External wall panel, 75mm (thickness)	Hebel PowerPanel 75 / PowerPanelXL	Helix Panels 75, Eastland External Wall 75, Hardie Gravis Wall 75, Nasahi Super75LD
Flooring panel, 75mm (thickness)	Hebel PowerFloor 75	Walsc AAC Flooring 75, Eastland AAC Flooring, Hardie Gravis Floor 75, Nasahi Flooring

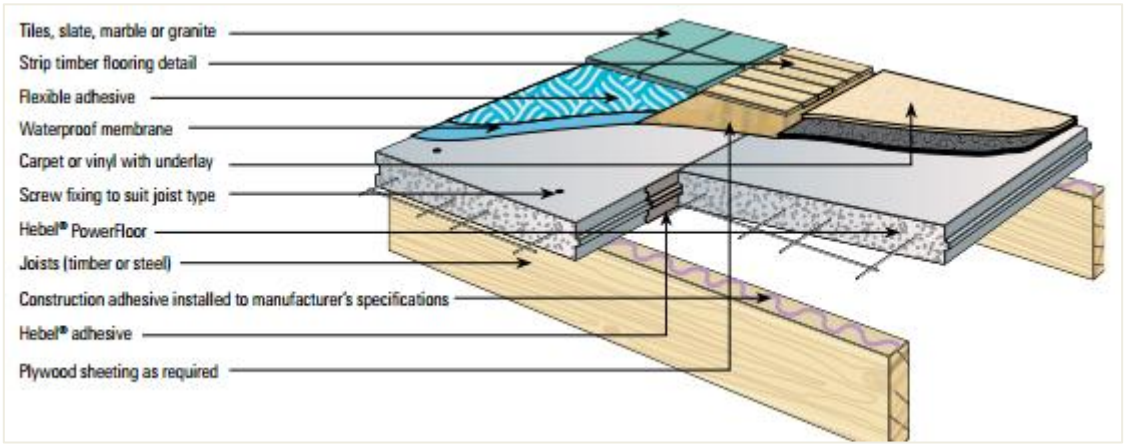
Visual representation

An AAC wall panel application can be assessed visually as follows:



Non-Confidential Diagram A-4.4.1: AAC wall panel application

An AAC floor panelling application can be assessed visually as follows:



Non-Confidential Diagram A-4.4.2: AAC floor panel application

The Hebel range and the imported goods are therefore alike in physical characteristics, commercial likeness, functional interchangeability and manner of production. They compete

directly for the same projects and are routinely substituted for one another at the specification stage

5. Describe the ways in which the essential characteristics of the imported goods are like to the goods produced by the Australian industry.

As detailed above, CSR considers that the essential characteristics of imported AAC are the same/similar to locally produced AAC. The essential characteristics include:

Physical likeness

CSR-manufactured AAC are alike in physical appearance to the imported goods.

Commercial likeness

CSR-manufactured AAC competes directly with imported AAC in the Australian market.

Functional likeness

The imported and Australian-produced AAC are used interchangeably in the same or comparable end-uses.

Production likeness

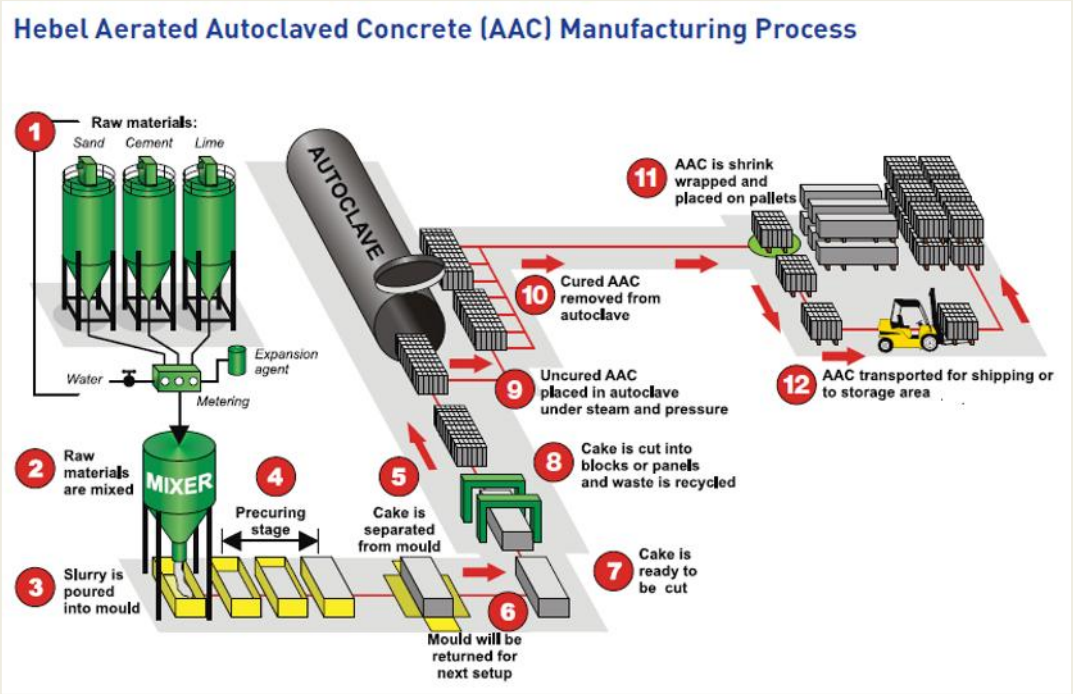
AAC produced in Australia is manufactured in a similar manner to the imported goods (see below at A-4.7).

6. What is the Australian and New Zealand Standard Industrial Classification Code (ANZSIC) applicable to your product.

ANZSIC 2034: Concrete Product Manufacturing.

7. Provide a summary and a diagram of your production process.

The AAC production process can be represented as follows:



Non-Confidential Diagram A-4.7: AAC production process

8. If your product is manufactured from both Australian and imported inputs:
   - describe the use of the imported inputs; and
   - identify that at least one substantial process of manufacture occurs in Australia (for example by reference to the value added, complexity of process, or investment in capital).

The expansion agent material added prior to mixing (noted at stage one in the production process diagram above) is an alumina paste which [***confidential text deleted:*** *raw material sourcing details and cost composition*].

9. If your product is a processed agricultural good, you may need to complete Part C-3 (close processed agricultural goods).

Not applicable.

10. Supply a list of the names and contact details of all other Australian producers of the product.

CSR is the only Australian producer of AAC.

11. If different models can be established for the goods subject to the application:
   - What are the differences in physical characteristics that give rise to distinguishable and material differences in price?

These are reflected in the below Model Control Code (**MCC**).

- Provide supporting documentation or analysis supporting the differences in physical characteristics that affects price comparability. Unit costs may also be used to demonstrate differences in physical characteristics where it affects price comparability.

These are reflected in Confidential Appendix A4.

- In providing the list of physical differences, identify the characteristics in order of significance.

These are reflected in the below MCC.

- Identify key characteristics where the physical differences are significantly different and it is not meaningful to compare models with different physical characteristics.

These are reflected in the below MCC.

- Identify the physical characteristics that can be reported in relation to sales and cost data respectively. This should be reflected in the sales data provided in appendices A4 and A6.

These are reflected in the below MCC, Confidential Appendix A4, and Confidential Appendix A6.1.

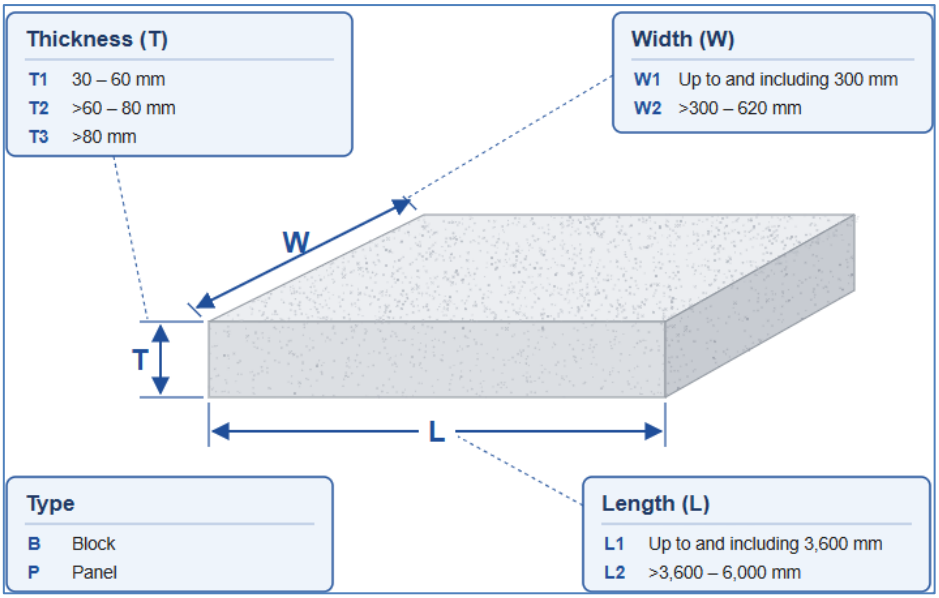
- Complete the table below having regard to the information provided above. The Commission will consider this information in establishing a model control code structure for the investigation.

The proposed MCC for the like goods and subject goods is as follows:

No.	Category	Sub-category	Identifier	Sales	Costs
1	Type	Block	B	Mandatory	Mandatory
		Panel	P		
2	Thickness	30–60mm	T1	Mandatory	Mandatory
		>60–80mm	T2		
		>80mm	T3		
3	Length	≤3,600mm	L1	Mandatory	Mandatory
		>3,600–6,000mm	L2		
4	Width	Up to and including 300mm	W1	Mandatory	Mandatory
		>300mm–620mm	W2		

Non-Confidential Table A-3.11.1: Proposed MCC structure

The following diagram identifies the four physical characteristics used to define the goods in the MCC:



Non-Confidential Diagram A-3.11.2: AAC product characteristics

A-5 The Australian market

1. Describe the end uses of both your product and the imported goods.

Typical end uses for the like/subject goods are as follows:

Common installation uses	Description/Explanation
External housing facades	The outside surface or finish of a building/residence.
Low rise multi-residential external facades	
Intertenancy and dual zero boundary walls	Intertenancy walls: a fire-resistant wall separating two tenancies (properties) extending fully from the floor to roof structure. Effectively, an internal dividing wall between two separate occupancies. Dual zero boundary walls: exist when two neighbouring buildings/properties are both built up to the property boundary with no gap between them (often a garage wall).
Low rise multi-residential intertenancy walls	As above.
Housing and low rise multi-residential flooring	Flooring in single and multi-level buildings.
High rise facades	As above.
High rise corridors	The common hallway inside an apartment, hotel or office building that connects lifts and stairwells to individual units, rooms or offices. Provides a safe pathway for people and goods movements.
High rise intertenancy	Much like low-rise, high-rise intertenancy walls separate apartments, hotel rooms, office and other tenancies within high rise buildings ensuring safety, privacy and noise control between occupants.
High rise shaft and service walls	High rise shaft walls: are a special fire-rated wall that surrounds lift shafts and service risers within high rise buildings. Designed in part to prevent fire and smoke travelling between floors whilst protecting services (pipes, cables, ducting) inside the shaft. High rise service walls: are a wall designed to contain and conceal plumbing, electrical, fire, data or other services within a high-rise building.

Non-Confidential Table A-5.1: AAC end uses

2. Describe the Australian market for the Australian and imported product and the conditions of competition within the overall market. Your description could include information about:
   - sources of product demand;
   - marketing and distribution arrangements;

- typical customers/users/consumers of the product;
- the presence of market segmentation, such as geographic or product segmentation;
- causes of demand variability, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production;
- the way in which the imported and Australian product compete; and
- any other factors influencing the market.

The Australian AAC market has grown steadily since CSR introduced Hebel products more than 30 years ago. Over that period, CSR has taken what began as a block building material and developed it into a distinct market for building panels.

Demand has been driven principally by housing construction on the eastern seaboard, with Victoria and New South Wales accounting for the bulk of adoption. Three factors are relevant to that growth:

- builders face sustained pressure to complete faster and to meet increasingly demanding compliance requirements, and AAC's panel format supports both;

- the evolution of Australian housing design toward rendered finishes and mixed-material façades has favoured AAC over competing cladding materials; and

- the technical properties of AAC (particularly its thermal and acoustic performance) deliver a consistent internal environment for occupants. In high-rise construction, acoustic and fire performance, alongside speed of installation, have been the primary drivers of uptake.

The market divides into three segments – residential, multi-residential and high-rise – each with distinct product requirements:

- residential and multi-residential: cladding, intertenancy and dual zero-boundary applications, using 50mm and 75mm panels in lengths from 2,700mm to 3,300mm, together with flooring panels.

- high-rise: predominantly 75mm tongue-and-groove panels in longer lengths of 3,000mm to 3,300mm.

The primary channels to market are resellers and installers. Reseller networks are typically aligned with installers and builders, allowing product to be delivered to site as required. Installers who carry their own stock represent a higher-value proposition to builders, as they can guarantee both availability and installation.

Competition is strongest in the residential segment, which accounts for the majority of AAC consumption and installation in Australia. That competition has been built on the market development work undertaken by CSR Hebel over three decades — a point illustrated by the design and installation guides published by importers and competitors, which closely replicate the equivalent Hebel documents.

3. Identify if there are any commercially significant market substitutes for the Australian and imported product.

Competing cladding-type materials include masonry bricks, fibre cement, and steel and timber cladding.

4. Complete appendix A1 (Australian production). This data is used to support your declaration at the beginning of this application.

CSR has completed Confidential Appendix A1 for the twelve months ending 30 June 2026.

5. Complete appendix A2 (Australian market).

CSR has completed Confidential Appendix A2 – Australian market for AAC.

6. Use the data from appendix A2 (Australian market) to complete this table:

Indexed table of sales quantities

Year Ending June	(a) Applicant Sales	(b) Other Aust. Sales	(c) Total Aust. Sales	(d) Dumped Imports	(e) Other Imports	(f) Total Imports	Total Market
2023	100.00	100.00	100.00	100.00	100.00	100.00	100.00
2024	99.46	100.00	99.46	212.93	192.85	212.66	110.07
2025	90.55	100.00	90.55	271.98	96.39	269.63	107.35
2026	92.24	100.00	92.24	305.56	726.00	311.20	112.78

A-6 Applicant's sales

1. Complete appendix A3 (sales turnover).

CSR has completed Confidential Appendix A3 for all sales of the like goods.

2. Use the data from appendix A3 (sales turnover) to complete these tables.

Indexed table of Applicant's sales quantities

Quantity (M3)	Year Ending June			
	2023	**2024**	**2025**	**2026**
All Products[5]				
Australian market	-	-	-	-
Export Market	-	-	-	-
Total	**-**	**-**	**-**	**-**
Like goods				
Australian market	100.00	99.46	90.55	92.24
Export Market	100.00	32.26	41.99	36.14
Total	**100.00**	**97.33**	**89.01**	**90.46**

[5] Units of measure vary across product categories. Data cannot therefore meaningfully be combined into a single index.

Indexed table of Applicant's sales values

Sales value ($)	Year Ending June			
	2023	2024	2025	2026
All Products				
Australian market	100.00	98.85	91.81	90.96
Export Market	100.00	45.85	60.14	47.92
Total	**100.00**	**98.72**	**91.74**	**90.85**
Like goods				
Australian market	100.00	105.32	96.54	94.74
Export Market	100.00	45.85	60.14	47.92
Total	**100.00**	**103.33**	**95.32**	**93.18**

3. Complete appendix A5 (sales of other production) if you have made any:
   - internal transfers; or
   - domestic sales of like goods that you have not produced, for example if you have imported the product or on-sold purchases from another Australian manufacturer.

CSR has completed Confidential Appendix A5.

4. Complete appendix A4 (domestic sales).

CSR has completed Confidential Appendix A4.

5. If any of the customers listed at appendix A4 (domestic sales) are associated with your business, provide details of the association. Describe the price effect of the association.

Not applicable.

6. Attach a copy of distributor or agency agreements/contracts.

Refer Confidential Attachment A-6.6.

7. Provide copies of any price lists.

Refer Confidential Attachment A-6.7.

8. If any price reductions (for example commissions, discounts, rebates, allowances and credit notes) have been made on your Australian sales of like goods provide a description and explain the terms and conditions that must be met by the customer to qualify.
   - Where the reduction is not identified on the sales invoice, explain how you calculated the amounts shown in appendix A4 (domestic sales).
   - If you have issued credit notes (directly or indirectly) provide details if the credited amount has not been reported appendix A4 (domestic sales) as a discount or rebate.

CSR provides the following price reductions on sales of like goods:

[***confidential text deleted:*** *price reduction mechanisms*]

9. Select two domestic sales in each quarter of the data supplied in appendix A4 (domestic sales). Provide a complete set of commercial documentation for these sales. Include, for example, purchase order, order acceptance, commercial invoice, discounts or rebates applicable, credit/debit notes, long or short-term contract of sale, inland freight contract, and bank documentation showing proof of payment.

Refer Confidential Attachment A-6.9.

10. Provide a list of model control codes from appendix A4.

Refer Confidential Appendix A4.

A-7 General accounting/administration information

1. Specify your accounting period.

CSR's statutory accounting period is January to December.

2. Provide details of the address(es) where your financial records are held.

CSR's financial records are held at 39 Delhi Road, North Ryde, NSW 2113.

3. To the extent relevant to the application, please provide the following financial documents for the two most recently completed financial years plus any subsequent statements:
   - chart of accounts;
   - audited consolidated and unconsolidated financial statements (including all footnotes and the auditor's opinion);
     internal financial statements, income statements (profit and loss reports), or management accounts, that are prepared and maintained in the normal course of business for the goods.
     These documents should relate to:

1. the division or section/s of your business responsible for the production and sale of the goods covered by the application, and
2. the company overall.

CSR's chart of accounts is provided at Confidential Attachment A-7.3.1. CSR's audited accounts for FY2024 and FY2025 are provided at Confidential Attachments A-2.9.1 and A-2.9.2.

4. If your accounts are **not** audited, provide the unaudited financial statements for the two most recently completed financial years, together with your taxation returns. Any subsequent monthly, quarterly or half yearly statements should also be provided.

Not applicable.

5. If your accounting practices, or aspects of your practices, differ from Australian generally accepted accounting principles, provide details.

Not applicable.

6. Describe your accounting methodology, where applicable, for:
   - the recognition/timing of income, and the impact of discounts, rebates, sales returns warranty claims and intercompany transfers;

[***confidential text deleted:*** *commercially sensitive accounting methodology details*]

   - provisions for bad or doubtful debts;

[***confidential text deleted:*** *commercially sensitive accounting methodology details*]

   - the accounting treatment of general expenses and/or interest and the extent to which these are allocated to the cost of goods;

[***confidential text deleted:*** *commercially sensitive accounting methodology details*]

   - costing methods (eg by tonnes, units, revenue, activity, direct costs etc) and allocation of costs shared with other goods or processes;

[***confidential text deleted:*** *commercially sensitive accounting methodology details*]

   - the method of valuation for inventories of raw material, work-in-process, and finished goods (eg FIFO, weighted average cost);

[***confidential text deleted:*** *commercially sensitive accounting methodology details*]

   - valuation methods for scrap, by-products, or joint products;

Not applicable.

- valuation methods for damaged or sub-standard goods generated at the various stages of production;

Not applicable.

- valuation and revaluation of fixed assets;

[***confidential text deleted:*** *commercially sensitive accounting methodology details*]

- average useful life for each class of production equipment, the depreciation method and depreciation rate used for each;

[***confidential text deleted:*** *commercially sensitive accounting methodology details*]

- treatment of foreign exchange gains and losses arising from transactions and from the translation of balance sheet items; and

[***confidential text deleted:*** *commercially sensitive accounting methodology details*]

- restructuring costs, costs of plant closure, expenses for idle equipment and/or plant shut-downs.

[***confidential text deleted:*** *commercially sensitive accounting methodology details*]

7. If the accounting methods used by your company have changed over the period covered by your application please provide an explanation of the changes, the date of change, and the reasons.

[***confidential text deleted:*** *commercially sensitive accounting methodology details*]

A-8 Cost information

1. Complete appendices A6.1 and A6.2 (cost to make and sell) for domestic and export sales.

CSR has completed Confidential Appendix A6.1 and A6.2.

2. Provide a list of model control codes from appendix A6.1 and A6.2.

Appendix A6.1 has been completed on a consolidated basis. Appendix A4 identifies [*XX*] model control codes (MCCs) across CSR's sales of the like goods during the period. Sales are heavily concentrated in [*XX*] MCCs, [*XX*] and [*XX*], which together comprise [*XX*] percent of sales volume and [*XX*] percent of sales value. The remaining [*XX*] MCCs each account for a negligible share, with no single MCC exceeding [*XX*] percent by volume. These [*XX*] MCCs are therefore representative of CSR's sales of the like goods as a whole, and the price and injury effects of the dumped and subsidised imports can reliably be assessed by reference to them in the consolidated Appendix A6.1.

A-9 Injury

The principal indicators of injury are price, volume and profit effects – although not all of these must be evident. For this application, profit refers to amounts earned. Profitability is the ratio of profit to sales revenue. Where the application includes a claim of threat of material injury you must also complete question C.2.

1. Estimate the date when the material injury from dumped and/or subsidised imports commenced.

CSR alleges that the material injury in its various forms, and arising from the volume and price effects of the dumped and subsidised goods from China, commenced from the beginning of FY2024, and with particular injurious prevalence in FY2026.

Specifically, CSR claims, and will establish in subsequent parts of this application, that it has experienced material injury during the proposed injury and investigation periods in the forms of:

- lower production volumes;
- lost sales volume and market share;
- price suppression;
- price depression;
- loss of profits;
- loss of profitability;
- decline in asset values;
- reduced revenue;
- reduced return on investment;
- reduced capacity utilisation; and
- reduced employment.

2. Using the data from appendix A6 (cost to make and sell), complete the following tables for each model control code of your production. P^n is the most recent period.

As noted at A-8.2, Appendix A4 identifies 13 model control codes (MCCs) across CSR's sales of the like goods during the period. Sales are heavily concentrated in two MCCs, P-T2-L1-W2 and P-T1-L1-W2, which together comprise 97.5 percent of sales volume and 95.5 percent of sales value. The remaining 11 MCCs each account for a negligible share, with no single code exceeding 1.2 percent by volume. These two MCCs are therefore representative of CSR's sales of the like goods as a whole, and the price and injury effects of the dumped and subsidised imports can reliably be assessed by reference to them in the consolidated Appendix A6.1.

Index	FY2023	FY2024	FY2025	FY2026
Production variations	100.00	99.83	96.57	94.61
Cost variations	100.00	110.09	110.94	121.43
Price variations	100.00	105.89	106.61	102.72
Profit variations[6]	100.00	90.21	82.35	32.34
Profitability variations	100.00	85.66	85.30	34.13

[6] Label M of Appendix A6.1.

3. Complete appendix A7 (other injury factors).

Where applicable to injury claims, prepare an indexed table for other injury factor(s) in the format above.

Index of Appendix A7 factors

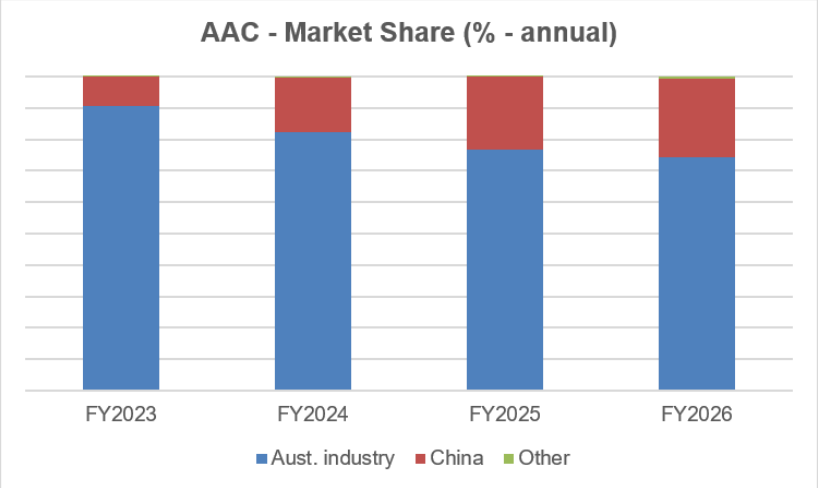
AAC	FY2023	FY2024	FY2025	FY2026
Asset values	100.00	[*XXX*]	[*XXX*]	81.53
Revenue	100.00	[*XXX*]	[*XXX*]	94.74
Return on Investment (sales)	100.00	[*XXX*]	[*XXX*]	59.47
Capacity Utilisation	100.00	[*XXX*]	[*XXX*]	92.69
Employment	100.00	[*XXX*]	[*XXX*]	94.33

A-10 Link between injury and dumped or subsidised imports

To establish grounds to initiate an investigation there must be evidence of a causal relationship between the injury and the alleged dumping or subsidisation. This section provides for an applicant to analyse the data provided in the application to establish this link. It is not necessary that injury be shown for each economic indicator.

1. Identify from the data at appendix A2 (Australian market) the influence of the volume of dumped and/or subsidised imports on your quarterly sales volume and market share.

There is a direct correlation between the ongoing presence and increase in volumes of AAC imported from China, and the Australian industry's annual sales volume and market share for the like goods. On an annual and quarterly basis, Non-Confidential Chart A-10.1.1 and Confidential Charts A-10.1.2/3 below highlight the respective shares of the total volume of AAC supplied in Australia by the Australian industry, by the subject imports, and by all other imports over the proposed inquiry period.



Non-Confidential Chart A-10.1.1: Year Ending June 2023-2026 Australian share (source: Appendix A2)



Confidential Chart A-10.1.2: FY2026 quarterly share compared to FY2025 average Australian share (source: Appendix A2)



Confidential Chart A-10.1.3: Quarterly FY2023-2026 (source: Appendix A2)

The above shows that over a period of market growth, imports from China captured the whole of the market's movement, while the Australian industry lost sales volume and market share in absolute terms:

- total apparent consumption of AAC in Australia was larger at the end of the period than at the start, rising from [*XX*] M³ in FY2023 to [*XX*] M³ in FY2026 (an increase of [*XX*] M³, or [*XX*] percent). The market grew strongly in FY2024 (by [*XX*] percent) to [*XX*] M³, contracted in FY2025 (a decline of [*XX*] percent), then recovered in FY2026 (by [*XX*] percent) to reach its highest level of the period at [*XX*] M³.

- domestic industry sales did not grow with the market. Sales fell, from [*XX*] M³ in FY2023 to [*XX*] M³ in FY2026 (a decline of [*XX*] M³ or [*XX*] percent). The fall was concentrated in FY2025 (down [*XX*] percent), and the marginal improvement in FY2026 ([*XX*] percent) recovered little of the lost ground. As a result, the Australian industry's share fell sharply, from [*XX*] percent in FY2023 to [*XX*] percent in FY2026, a loss of [*XX*] percentage points.

- imports from China rose from [*XX*] M³ in FY2023 to [*XX*] M³ in FY2026, an increase of [*XX*] M³ ([*XX*] percent). This represented more than a tripling over the period, with the sharpest step in FY2024 (increasing by [*XX*] percent). This increase was equal to [*XX*] percent of the market's entire net growth ([*XX*] M³): China acquired the whole of the growth and a further volume of roughly [*XX*] M³ drawn directly from the sales the Australian industry previously held. China's share of the market rose from [*XX*] percent to [*XX*] percent, a gain of [*XX*] percentage points. This accounts for the bulk of the [*XX*]-point share loss suffered by the Australian industry, with the small remainder reflected in a modest rise in the share of other imports.

- non-subject imports remained minor throughout, staying below approximately [*XX*] percent of the market until FY2026, when they rose to around [*XX*] percent ([*XX*] M³). Even at that level they were small relative to Chinese imports, and the contest for the Australian market was therefore one between Chinese imports and the domestic industry, with material volumes moving away from the latter.

Over the four years to FY2026, the Australian industry lost both sales volume and market share, while imports from China more than tripled and captured more than the whole of the market's net growth. Other sources rose in FY2026 but remained small. The movement of share and volume from the domestic industry to Chinese imports is substantial and deleterious, and is consistent with material injury to the Australian industry.



Confidential Table A-10.1.1: Australian market volumes by source (M³)

2. Use the data at appendix A2 (Australian market) to show the influence of the price of dumped and/or subsidised imports on your quarterly prices, profits and profitability provided at appendix A6.1 (costs to make and sell). If appropriate, refer to any price undercutting and price depression evident in the market.

Influence on prices

The correlation between the Australian industry's quarterly selling prices for the like goods and the annual FOB export prices for the dumped and subsidised imports across the injury analysis and investigation period exists because the Australian industry's prices were influenced by the presence and prices of the dumped and subsidised imports. Specifically, CSR has responded to the presence of imports (by importers of the dumped goods) by depressing and suppressing its prices for like goods.

The Commission's Dumping and Subsidy Manual (**the Manual**)[7] states that price suppression, in terms of Article 3.2 of the ADA, is where price increases for the Australian industry's products, which otherwise would have occurred, have been prevented to a significant degree.[8] In determining whether price suppression has occurred, the Commission may examine:[9]

- a comparison of prices with costs to assess whether over time (e.g. the injury analysis period) or within a specified period (e.g. the investigation period) prices have not increased at the same rate as cost increases; and/or

- an assessment as to whether the prices for the Australian industry's product are lower than prices that may have been achieved in the absence of dumping.

In either case, the Commission will base its price suppression analysis on a counterfactual conclusion, assessing what trend in, or level of, prices the Australian industry would have achieved in the absence of dumping.[10]

CSR submits that, absent imports from China at material margins of dumping, it would have achieved prices indicative of a level playing field in the Australian market.

CSR provides the following evidence of customer price correspondence and negotiations for supply of AAC during FY2026. The price undercutting and therefore price depression has caused material injury to CSR.

[***confidential details deleted:*** *evidence of price undercutting and price depression in the market*].

Influence on profits and profitability

CSR competes on price to maintain production volume. Therefore, the Australian industry's profits (expressed as net gains or losses) and profitability are affected by factors impacting its ability to raise prices sufficient to cover costs.

Subject imports have influenced profits and profitability cumulatively, through the sustained growth of low-priced Chinese volume and market share over the proposed injury and dumping periods. Throughout these periods, the Australian industry lost sales volumes and was unable to raise its prices to recover rising costs. In the most recent year, CSR was forced to lower prices outright, with profits and profitability falling heavily.

3. Compare the data at appendix A2 (Australian market) to identify the influence of dumped and/or subsidised imports on your quarterly costs to make and sell at appendix A6.1 (for example refer to changes in unit fixed costs or the ability to raise prices in response to material cost increases).

Confidential Chart A-10.3.1 below indicates that the Australian industry experienced price suppression throughout the assessment period with rising import volumes from China. As Chinese import volumes have risen, the price suppression gap has widened:

[7] Dumping and Subsidy Manual, December 2021.
[8] The Manual, p. 16.
[9] Ibid.
[10] Ibid.



Confidential Chart A-10.3.1: China volume influence on net prices, together with unit CTMS of Australian industry's own production; FY2023-2026 (Sources: Appendix A2 and A6.1)

4. The quantity and prices of dumped and/or subsidised imported goods may affect various economic factors relevant to an Australian industry. These include, amongst other things, the return on investment in an industry, cash flow, the number of persons employed and their wages, the ability to raise capital, and the level of investment in the industry. Describe, as appropriate, the effect of dumped and/or subsidised imports on these factors and where applicable use references to the data you have provided at appendix A7 (other economic factors). If factors other than those listed at appendix A7 (other economic factors) are relevant, include discussion of those in response to this question.

The impact of the dumped and subsidised AAC from China has been significant in terms of price and volume effect injury. CSR can demonstrate at Confidential Appendix A7 that it has also experienced injury in other forms, including:

- decline in asset values;
- decline in revenue;
- decline in return on investment;
- reduced capacity utilisation; and
- reduced employment.

5. Describe how the injury factors caused by dumping and/or subsidisation and suffered by the Australian industry are considered to be 'material'.

CSR considers that it has experienced material injury during the proposed injury assessment and dumping periods in the following forms:

- lower production volumes;
- lost sales volume and market share;
- price suppression;
- price depression;
- loss of profits;
- loss of profitability;
- decline in asset values;

- reduced revenue;
- reduced return on investment;
- reduced capacity utilisation; and
- reduced employment.

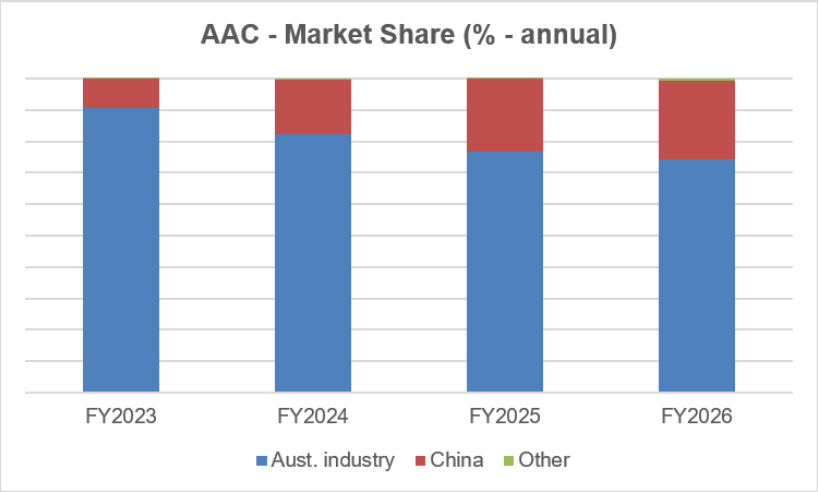
Volume/market share effects

CSR's sales volumes declined throughout the assessment period, resulting in a material loss of market share to dumped and subsidised imports from China. The above customer-specific volume loss examples provided detail the share loss evident to the Australian industry.

AAC	FY2023	FY2024	FY2025	FY2026
Sales quantity	100.00	99.46	90.55	92.24

Non-Confidential Table A-10.5.1: Index of Australian industry's sales of AAC; FY2023-2026 (source: Appendix A6.1)

Non-Confidential Chart A-10.5.1 below shows that the Australian industry share of the Australian market for AAC:



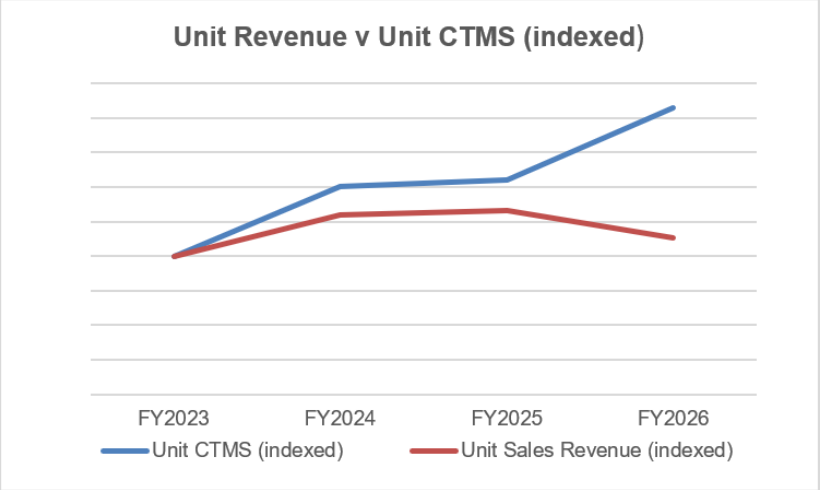
Non-Confidential Chart A-10.5.1: Australian market share for AAC (source: Appendix A2)

CSR submits that the volume injury is material. Because the domestic industry lost volume it previously held, the injury is not confined to foregone growth. Had the Australian industry maintained its FY2023 market share through to FY2026, it would have sold approximately [*XX*] M³ (approximately [*XX*] M³, or [*XX*] percent), more than the [*XX*] M³ it sold. This shortfall, alongside the absolute decline in sales, indicates the volume displaced by the subject imports over the period.

Price depression and suppression

Price suppression occurs when price increases, which otherwise would have occurred, have been prevented. One indicator of price suppression is the margin between revenues and costs. This approach is proposed by the Applicants, as it contends that a normal business unaffected by dumping would look to increase prices to, at a minimum, cover its cost to make and sell (**CTMS**) and attempt to maximise profits.

Non-Confidential Chart A-10.5.2 and Confidential Chart A-10.5.3 below demonstrate movements in Australian industry unit net sales revenue and unit CTMS (indexed and actuals) for AAC across the proposed injury analysis and dumping periods:



Non-Confidential Chart A-10.5.2: Australian industry unit selling price and CTMS; quarterly FY2023-2026 – indexed (source: Appendix A6.1)



Confidential Chart A-10.5.3: Australian industry unit selling price and CTMS; quarterly FY2023-2026 – actuals (source: Appendix A6.1)

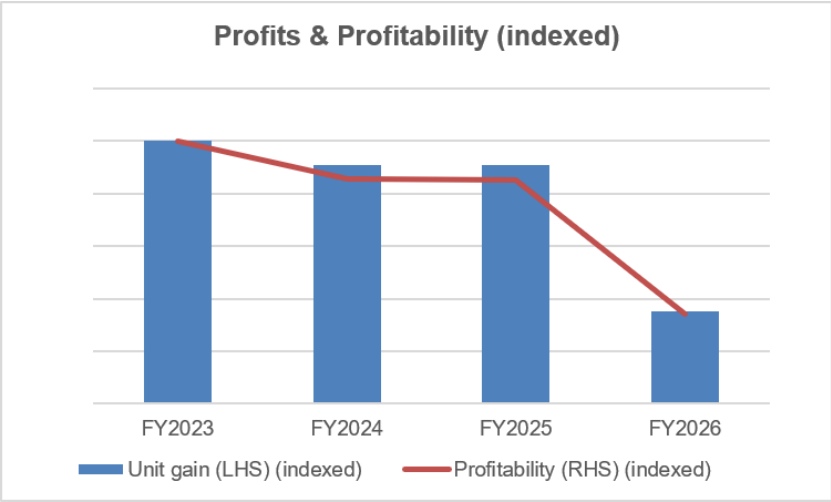
Over the four years to FY2026, the Australian industry's unit cost to make and sell rose by approximately [*XX*] percent (to index [*XX*]), while its unit selling price rose by only approximately [*XX*] percent (to index [*XX*]). This equates to prices rising at approximately one-eighth the rate of costs. CSR was therefore unable to pass cost increases through to price. This indicates price suppression: prices were prevented from rising due to subject imports. Such prices would have otherwise risen to recover rising costs.

In addition, CSR's selling prices declined in FY2026. On an annual basis the unit selling price, having increased in FY2025 (index [*XX*]), fell to index approximately [*XX*] percent in FY2026. On a quarterly basis, the decline was sustained: from a peak in FY2025 Q4 the unit price fell in each of the four quarters of FY2026 ([*XX*] percent). This depression occurred as costs were rising most steeply; the unit CTMS rose approximately [*XX*] percent in FY2026 alone.

As the injury examples above show, AAC is contested primarily on price. The growth of low-priced Chinese imports established a ceiling on, and pulled down, the prices the Australian industry could achieve. As detailed in Appendix A2, Chinese import volumes nearly tripled over the period and China's market share rose from [*XX*] percent to [*XX*] percent. Facing this, the industry could neither recover rising costs nor, by FY2026, hold its prices.

Profits & profitability

Non-Confidential Chart A-10.5.4 and Confidential Chart A-10.5.5 below indicate that the Australian industry experienced materially declining profits and profitability across the proposed injury analysis and dumping periods:



Non-Confidential Chart A-10.5.4: Australian industry profits and profitability – indexed (source: Appendix A6.1)



Confidential Chart A-10.5.5: Australian industry profits and profitability – actuals (source: Appendix A6.1)

The combined effect of suppressed and then falling prices against rising costs directed the industry's unit profit down by approximately [*XX*] percent (to index [*XX*]) and its profitability down by approximately [*XX*] percent (to index [*XX*]) between FY2023 and FY2026, the greater part of the decline occurring in FY2026.

This occurred while the industry's sales volumes were falling, down approximately [*XX*] percent over the period. CSR has therefore suffered material injury on both fronts, selling less and earning far less on each unit. On a quarterly basis, profitability has fallen to negligible levels in the most recent FY2026 quarters.

Other economic factors

CSR considers it has also experienced material injury across other relevant economic factors as set out in s.269TAE(3). Specifically, injury in the form of:

Factor	FY2023	FY2024	FY2025	FY2026
Asset values	100.00	[*XXX*]	[*XXX*]	81.53
Revenue	100.00	[*XXX*]	[*XXX*]	94.74
Return on investment (sales)	100.00	[*XXX*]	[*XXX*]	59.47
Capacity utilisation	100.00	[*XXX*]	[*XXX*]	92.69
Employment	100.00	[*XXX*]	[*XXX*]	94.33

Non-Confidential Table A-10.5.2: Index of other economic factors (source: Appendix A7)

All factors have fallen below FY2023 levels:

- the industry's return on investment fell by approximately 40 percent over the period (to index 59.5), the decline most prevalent in FY2026 when it fell from above its FY2023 level to well below it, aligning with the collapse in the industry's profitability.

- employment fell by approximately 5.7 percent, with the sharpest reduction in FY2024, reflecting a contraction in the industry's operating scale.

- the value of the industry's assets declined in each year of the period, ending approximately 18 percent below its FY2023 level.

- capacity utilisation has been persistently low and has deteriorated further. In FY2023 the Australian industry utilised only [*XX*] percent of its [*XX*] m³ nameplate capacity for like goods, well below efficient operating levels. Utilisation then fell each year to [*XX*] percent, [*XX*] percent, then to [*XX*] percent in FY2026, as production of like goods dropped [*XX*] percent from [*XX*] m³ to [*XX*] m³ while capacity remained unchanged. By FY2026, approximately [*XX*] m³ ([*XX*] percent) of capacity was sitting idle. CSR has been unable to lift production and utilisation as dumped and subsidised AAC from China has taken volume the domestic industry would otherwise have supplied. As a result, fixed costs are spread over a shrinking production base, which increases unit costs and erodes profitability.

- revenue, having risen in FY2024, declined thereafter to finish approximately 5 percent below its FY2023 level, as the industry's loss of volume outweighed the modest movement in its prices.

These movements confirm that the injury caused by the subject imports extends beyond sales volume, market share, price and profitability to the industry's investment returns, employment, assets, capacity utilisation and revenue.

Materiality of Injury

In the context of the Australian conditions for AAC over the proposed injury analysis and dumping periods, CSR contends that the injury suffered by it (and caused by the dumped imports from China) is greater than that likely to occur in the normal ebb and flow of business.

CSR has experienced declines in revenue over the injury analysis and investigation periods, alongside corresponding declines in profitability.

CSR has lost sales volumes and market share, and has experienced price suppression and depression. When considered as a whole, these factors have adversely impacted like goods profits and profitability, collectively and not in isolation. When also taking account of all relevant economic factors, the Australian industry has experienced injury from trade in the subject goods from the subject countries, and such injury is considered material.

6. Discuss factors other than dumped and/or subsidised imports that may have caused or may threaten to cause injury to the industry. This may be relevant to the application in that an industry weakened by other events may be more susceptible to injury from dumping and subsidisation.

CSR does not consider that factors other than dumped and subsidised imports from China have caused the material injury alleged.

7. This question is not mandatory, but may support your application. Where trends are evident in your estimate of the volume and prices of dumped and/or subsidised imports, forecast their impact on your industry's economic condition. Use the data at appendix A2 (Australian market), appendix A6 (cost to make and sell), and appendix A7 (other economic factors) to support your analysis.

The actual economic impact of the volume and prices of dumped and subsidised imports have been detailed above. Expected future impacts are quantified by CSR in forward budgeting and forecast assessments.

PART B

DUMPING

IMPORTANT

All questions in Part B should be answered even if the answer is 'Not applicable' or 'None' (unless the application is for countervailing duty only: refer Part C). If an Australian industry comprises more than one company/entity, Part B need only be completed once.

B-1 Source of exports

1. Identify the country(ies) of export of the dumped goods.

The goods the subject of this application are exported from China.

2. Identify whether each country is also the country of origin of the imported goods. If not, provide details.

CSR understands that the country of export is also the country of origin of the goods the subject of this application.

3. If the source of the exports is a non-market economy, or an 'economy in transition' refer to Part C.4 and Part C.5 of the application.

Not applicable.

4. Where possible, provide the names, addresses and contact details of:
   - producers of the goods exported to Australia;
   - exporters to Australia; and
   - importers in Australia.

The following are understood by CSR to be possible Chinese producers and exporters of AAC:

Company	Address	Contact details
UBlok Advanced Materials Co., Ltd.	No. 4-2 Puchang Road, Xiaopu Town, Changxing County, Huzhou, Zhejiang Province, China	AAC products: +86 133 7206 7755; plant: +86 138 5726 7747 URL: ublok.com.cn
Nanjing Asahi New Building Materials Co., Ltd. – NASAHI	No. 1 Jiantong Road, Yuhuatai District, Nanjing, Jiangsu Province, China	Australian representative: +61 3 9790 6406 or 1300 26 27 24 URL: nasahi.net.au
EASTLAND (China) Company / Eastland Building Materials	Room 2404, Building 4, No. 37 Pukou Avenue, Nanjing, Jiangsu Province 210000, China	+86 25 8369 0182; mobile/WeChat/WhatsApp: +86 138 5176 9492 URL: eastlandchina.com
Zhejiang Yuanzhu Housing Industrialization Co., Ltd. – Dingyuan Group	Zhejiang Province, China	Not verifiable.
Hangzhou Huafei Express Import & Export Co., Ltd. – Ecotrend	Room 1101, Huijin Financial Center, No. 148 Jincheng Road, Xiaoshan District, Hangzhou, Zhejiang Province, China	+86 571 8299 8292; mobile: +86 135 8829 0920 URL: ecotrendmaterials.com
Beijing SOHO	Beijing, China	URL: beijingsoho.com

Building Materials Co., Ltd. / Beijing SOHO International		
Shandong Yuanda Innovative Materials Co., Ltd. / Yuanda AAC	Shandong Province, China	Not verifiable.
China National Building Material Company Limited – CNBM Co., Ltd.	Tower 2, Guohai Plaza, No. 17 Fuxing Road, Haidian District, Beijing 100036, China	+86 10 6813 8300; fax: +86 10 6813 8388 URL: cnbmlyd.com

The following are understood by CSR to be potential Australian importers of Chinese AAC:

[***confidential table deleted:*** *disclosure of Australian importers would likely result in commercial disadvantage to CSR*].

5. If the import volume from **each** nominated country at Appendix A.2 (Australian Market) does not exceed 3% of all imports of the product into Australia refer to Part C.6 of the application.

Not applicable. Import volumes from China are estimated to exceed 3 percent of all imports of the goods the subject of this application.

6. In the case of an application for countervailing measures against exports from a developing country, if the import volume from **each** nominated country at Appendix A.2 (Australian Market) does not exceed 4% of all imports of the product into Australia refer to Part C.6 of the application

Not applicable as the import volumes from China is estimated to exceed 4 percent of all imports of the goods the subject of this application.

B-2 Export price

Possible sources of information on export price include export price lists; estimates from the Australian Bureau of Statistics; a deductive export price calculation from the Australian selling price of the imported goods; export sales quotations or invoices; foreign government export trade clearances.

1. Indicate the FOB export price(s) of the imported goods. Where there are different model control codes or levels of trade involved, an export price should be supplied for each.

CSR has included FOB values for the subject goods per Confidential Appendix A2, as sourced from the *Australian Bureau of Statistics*.

2. Specify the terms and conditions of the sale, where known.

The export prices for the imported goods from China are FOB, export point of sale.

3. If you consider published export prices are inadequate, or do not appropriately reflect actual prices, please calculate a deductive export price for the goods. Appendix B1 (Deductive Export Price) can be used to assist your estimation.

The researched export price data for China is considered adequate for the purposes of this application.

4. It is important that the application be supported by evidence to show how export price(s) have been calculated or estimated. The evidence should identify the source(s) of data.

Refer Confidential Appendix A2 for import volume and value details for the goods the subject of this application.

B-3 Selling price (normal value) in the exporter's domestic market

Possible sources of information about domestic selling prices in the country of export include: price lists for domestic sales (with information on discounts); actual quotations or invoices relating to domestic sales; published material providing information on the domestic selling prices; or market research undertaken on behalf of the applicant.

1. State the selling price for each model control code of like goods sold by the exporter, or other sellers, on the domestic market of the country of export.

I. Introduction

Section 269TAC(1) of the *Customs Act 1901* (Cth) (the **Act**) provides that, subject to the operation of subsections 269TAC(2) to (5C), the normal value of any goods exported to Australia is the price paid or payable for like goods sold in the ordinary course of trade for home consumption in the country of export in sales that are arms-length transactions by the exporter, or, if such sales are not available, by other sellers of like goods.[11]

Subsection 269TAC(2)(a)(ii) provides that the Minister cannot ascertain the normal value of goods under s.269TAC(1) where the Minister is satisfied that *…because of the situation in the market of the country of export, sales in that market are not suitable for use in determining a price under subsection (1)*.[12] In such a case, the normal value must instead be determined by reference either to a constructed cost build-up under s.269TAC(2)(c), or by reference to third-country sales under s.269TAC(2)(d). This framework implements Australia's obligations under Article 2.2 of the WTO *Agreement on Implementation of Article VI of GATT 1994* (the **Anti-Dumping Agreement**).[13]

[11] Customs Act 1901 (Cth), s.269TAC(1).
[12] Customs Act 1901 (Cth), s.269TAC(2)(a)(ii).
[13] WTO Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade 1994, Article 2.2 (the Anti-Dumping Agreement).

The Commission's *Dumping and Subsidy Manual* (**the Manual**) identifies, non-exhaustively, factors that may render domestic sales unsuitable for the purposes of s.269TAC(1), including:[14]

(a) where domestic prices are "artificially low"; or

(b) where some other condition in the market makes sales in that market "not suitable for use in determining prices under subsection 269TAC(1)".

According to the Manual:[15]

> *Government influence on prices or costs could be one cause of "artificially low pricing". Government influence means influence from any level of government.*
>
> *In investigating whether a market situation exists due to government influence, the Commission will seek to determine whether the impact of the government's involvement in the domestic market has materially distorted competitive conditions. A finding that competitive conditions have been materially distorted may give rise to a finding that domestic prices are artificially low or not substantially the same as they would be if they were determined in a competitive market.*

CSR submits that a particular market situation (**PMS**) exists in the Chinese market for AAC within the meaning of s.269TAC(2)(a)(ii), such that sales in that market are not suitable for use in determining a price under s.269TAC(1). Normal values should instead be constructed under s.269TAC(2)(c).

The PMS arises because Government of China (**GOC**) influence renders the costs of the principal inputs to AAC – cement, lime, the aluminium aeration agent, fly ash and silica, gypsum, energy, land and capital – not substantially the same as they would be in a competitive market.

II. Legal Standard

Sections 269TAC(1) and TAC(2)(c) of the Act give domestic effect to Article 2.2 of the WTO's Anti-Dumping Agreement (**ADA**), which states:

> *When there are no sales of the like product in the ordinary course of trade in the domestic market of the exporting country or when, because of the particular market situation or the low volume of sales in the domestic market of the exporting country, such sales do not permit a proper comparison, the margin of dumping shall be determined by comparison with … the cost of production in the country of origin plus a reasonable amount for administrative, selling and general costs and for profits.*

The WTO Panel (**the Panel**) in *Australia – Anti-Dumping Measures on A4 Copy Paper* (**A4 Copy *Paper***) interpreted this provision to mean that "the phrases 'particular market situation' and 'permit a proper comparison' work together to constitute a condition under which an investigating authority may set aside domestic-market sales as the basis for normal value."[16] The Panel's reading establishes a two-step, case-specific and fact-driven analysis[17] in which

[14] Anti-Dumping Commission, *Dumping and Subsidy Manual* (December 2021), Chapter 7, p. 29.
[15] Ibid.
[16] Non-Confidential Attachment B-3.1: Panel Report, Australia – Anti-Dumping Measures on A4 Copy Paper (**A4 Copy Paper**), WT/DS529/R, para. 7.27.
[17] Ibid, at para. 7.21.

the authority must determine, sequentially: (1) whether a PMS exists in the domestic market of the exporting country; and (2) if so, whether, as a consequence of that PMS, the individual exporter's domestic sales fail to permit a proper comparison between domestic and export prices.[18]

The Panels in A4 Copy Paper and in *European Union – Cost Adjustment Methodologies and Certain Anti-Dumping Measures on Imports from Russia (Second Complaint)* ("*EU-Cost Adjustment Methodologies (Second)*") elaborated this framework with the following additional guidance:

- the wording of Article 2.2 cannot be read as restricting the phrase "particular market situation" to any single, defined situation.[19]

- the phrase "particular market situation" is not a definition capable of foreseeing every set of circumstances an investigating authority may confront in which a proper comparison cannot be made. In the Panel's view, the use of such an expression must be treated as intentional. The expression is bounded by its qualifiers "particular" and "market", but for that reason cannot be construed in a way that exhaustively details the circumstances or arrangements which would amount to a situation that an investigating authority may need to assess.[20]

- the market situation must be distinct, individual, single, or specific, but this does not necessarily render it unusual or out of the ordinary.[21]

- neither the text nor the operation of Article 2.2 supports a PMS assessment as necessarily relating exclusively to a country "as a whole".[22]

- the Panel identified no basis for the argument that, when examining a PMS allegation, an investigating authority is precluded from analysing "whether prices are 'artificially low' on the basis of an examination of supply and demand signals in markets, of alleged market distortions, or of product or input prices as compared to prices in world markets or representative markets."[23]

- a determination of "particular market situation" based on the existence of low input prices, on a factual finding concerning a situation that allegedly did not exclusively affect domestic sales, or on certain government policies affecting the input sector does not render the determination inconsistent with Article 2.2 of the AD Agreement.[24]

- the term "particular market situation" does not require or contemplate an *in abstracto* analysis of whether the situation is capable of preventing domestic sales from permitting a proper comparison. That assessment is already properly and adequately performed by the words "because of" and "not permit a proper comparison" in Article 2.2.[25]

[18] Ibid, at para. 7.91.
[19] Non-Confidential Attachment B-3.2: Panel Report, European Union – Cost Adjustment Methodologies and Certain Anti-Dumping Measures on Imports from Russia (Second Complaint) (EU-Cost Adjustment Methodologies (Second)), WT/DS494/R, para. 7.181.
[20] Non-Confidential Attachment B-3.1: A4 Copy Paper, at para. 7.21.
[21] Ibid, at para. 7.22.
[22] Non-Confidential Attachment B-3.2: EU-Cost Adjustment Methodologies (Second) at para. 7.195, Annex 4.
[23] Ibid, at para. 7.197, Annex 4.
[24] Non-Confidential Attachment B-3.1: A4 Copy Paper, at paras. 7.32, 7.40, 7.56, and 7.57.
[25] Ibid, at para. 7.27.

- where the investigating authority has determined that a PMS exists, it must then examine whether a proper comparison between domestic and export prices is or is not permitted. The proper comparison requires an assessment of the differences between domestic and export prices.[26]

- although the proper comparison referred to in Article 2.2 is the comparison between domestic and export prices, a comparison based only on the numerical relationship between those two prices may disclose nothing about whether the domestic price can be properly compared with the export price. What is required, instead, is a qualitative comparison of the two prices.[27]

- the Panel observed:[28]

> *In our view, the way in which the domestic prices and export prices of an individual exporter [footnote omitted] respond to an equal reduction in input costs is likely to depend significantly on a range of factors, including the conditions of competition prevailing in each market and the existing relationship between price and cost. We consider that an exporter may have different options as to how to take advantage of a decrease in input cost depending on the market conditions in each market. This is similar to a circumstance in which a cost increase occurs and the exporter encounters different market conditions in the domestic and the export markets such that the exporter can pass on the cost increase to customers in one market but cannot do so in the other. We are therefore not persuaded that a low-priced input used identically to produce merchandise for both the domestic and export markets will necessarily have the same effect on domestic and export prices and will therefore necessarily permit a proper comparison. We find rather that whether the exporter's domestic sales permit a proper price comparison with the export price is a question that can only be resolved through an examination of the relevant factual circumstances.*

CSR's case is farmed to meet the legal standard; the PMS is alleged input-by-input, and the benchmark methodology displaces those input costs shown to be distorted.

III. A PMS Exists in the Chinese AAC Market

Government influence over the Chinese building materials sector

China is a "socialist market economy" in which the Chinese Communist Party (**CCP**) exercises pervasive guidance and control over economic decision-making at the central, provincial, municipal and enterprise levels.[29] As the European Commission concluded in the *Commission Staff Working Document on Significant Distortions in the Economy of the People's Republic of China for the Purposes of Trade Defence Investigations* (**EC 2024 Distortions Report**), SWD(2024) 91 final (10 April 2024):[30]

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[26] Ibid, at para. 7.73.
[27] Ibid, at para. 7.75.
[28] Ibid, at paras. 7.80 and 7.81.
[29] Constitution of the People's Republic of China (as amended 2018), Article 1 (describing China as a "socialist state"); see also Article 6 (on socialist public ownership of the means of production). Refer https://english.www.gov.cn/archive/lawsregulations/201911/20/content_WS5ed8856ec6d0b3f0e9499913.html
[30] Non-Confidential Attachment B-3.3: European Commission, Commission Staff Working Document on Significant Distortions in the Economy of the People's Republic of China for the Purposes of Trade Defence Investigations, SWD(2024) 91 final (10 April 2024), Chapter 2 (Socialist Market Economy).

China's economic system is unique, with a particular role of the State and of the CCP [chapter reference omitted]. The doctrine of social market economy is one of those elements that embodies China's specific socio-economic setup. The basic features of the socialist market economy are dominant State-ownership [chapter reference omitted] an extensive and sophisticated economic planning system [chapter reference omitted], as well as interventionist industrial policies and a broad array of other tools to pursue political and economic objectives set by the Party.

The European Commission, citing Chinese government statistics, has found that as of recent years approximately 70 percent of private enterprises in China have established CCP cells, and that the CCP has institutionalised mechanisms for influencing the operational and strategic decision-making of those enterprises.[31] In Commission Implementing Regulation (EU) 2021/635 (hot-rolled steel from China), the Commission specifically observed that CCP cells within both state-owned and private enterprises interfere with business decisions.[32] The legal basis for this institutional party influence is well established:

(a) Article 33 of the CCP Constitution requires that Primary-level Party organisations in state-owned enterprises play a leadership role and discuss and decide on major issues of their enterprise. In non-public economic entities, primary-level Party organisations are mandated to ensure implementation of Party policy, supervise enterprises in observing the laws of the State, and provide political guidance to management.[33]

(b) Article 18 of the Company Law of the People's Republic of China (2023 Revision) provides that *..In the company, in accordance with the provisions of the Constitution of the Communist Party of China, an organisation of the Communist Party of China shall be established to carry out party activities. The company shall provide necessary conditions for the activities of party organisations*.[34]

(c) The China Securities Regulatory Commission's *Code of Corporate Governance for Listed Companies* (revised 2018) requires listed SOEs to incorporate Party-building principles into their articles of association and to formalise the role of Party organisations in corporate governance.[35]

Major distortions in critical cost areas

Cement

Cement is a primary calcareous binder in AAC. The Chinese cement sector is characterised by extensive state ownership (notably the China National Building Material Group Co., Ltd. see further below), chronic overcapacity, and active government intervention in capacity and output (capacity-swap policies, mandated capacity reduction, promotion of consolidation, and peak-shifting controls), each of which displaces price from competitive levels. The OECD identifies cement as among the most heavily subsidised heavy industries in China, alongside

[31] Ibid, Chapter 3 (Chinese Communist Party).
[32] Non-Confidential Attachment B-3.4: Commission Implementing Regulation (EU) 2021/635 of 16 April 2021 imposing a definitive anti-dumping duty on imports of certain welded tubes and pipes of iron or non-alloy steel originating in Belarus, the People's Republic of China and Russia, recital 119 (p. 15).
[33] Non-Confidential Attachment B-3.5: Seafarer, Prevailing Winds, *Party Committees in Chinese Companies*, June 2021.
[34] Non-Confidential Attachment B-3.6: Company Law of the People's Republic of China (2023 Revision), Article 18.
[35] Non-Confidential Attachment B-3.7: China Securities Regulatory Commission, Code of Corporate Governance for Listed Companies (revised 30 September 2018).

steel and aluminium,[36] and its MAGIC assessment places cement among the Chinese sectors in which firms receive subsidies, exceeding 15 percent of revenue.[37]

Lime

Quicklime and hydrated lime are the second calcareous production input. Lime is produced by numerous smaller kilns, so market-structure evidence is thinner; however lime production is highly energy-intensive and is therefore exposed to the same coal and electricity distortions alleged below, and is subject to environmental and capacity controls. CSR's allegation as to lime is inferential on the basis that the energy-cost channel brings lime within the PMS.

Aluminium powder / paste (the aeration agent)

The aluminium aeration agent is the input that defines AAC (no other masonry product depends upon it). This makes AAC uniquely exposed to China's aluminium subsidies. The OECD found that government support is especially heavy in China across the aluminium value chain, with upstream support conferring significant benefit downstream,[38] and that of the USD$70 billion provided to the seventeen largest aluminium firms (2013–17), 85 percent went to five Chinese-owned firms.[39] On the most recent OECD MAGIC release, 2024 aluminium subsidies were 4.4 percent of revenue in China against 0.5 percent in OECD countries, and China's share of global primary aluminium output grew from 11 percent to 61 percent over twenty years.[40] [41] CSR request that the Commission assess the pass-through of below-market primary aluminium into the powder/paste purchased by the AAC exporters, and the ownership and pricing of the relevant suppliers.

Fly ash and silica

Fly ash is the principal siliceous input for Chinese AAC. It is a by-product of coal combustion; its abundance and low-price flow directly from a subsidised, over-built Chinese coal-fired power fleet, and its use in AAC is actively promoted and tax-favoured (see Section

[36] Non-Confidential Attachment B-3.1-3. OECD, OECD Steel Outlook 2025 (DOI 10.1787/28b61a5e-en): steel is comparable to other heavy industries such as aluminium, cement and shipbuilding; China's subsidisation rate is ten times that of OECD countries, https://www.oecd.org/en/publications/oecd-steel-outlook-2025_28b61a5e-en/full-report/steel-subsidies-fuelling-excess-capacity_f46e3c40.html. Report PDF: https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/05/oecd-steel-outlook-2025_bf2b6109/28b61a5e-en.pdf.

[37] Non-Confidential Attachment B-3.1-4. OECD, How governments back the largest manufacturing firms: Insights from the OECD MAGIC Database, OECD Trade Policy Papers No. 289 (Feb 2025, DOI 10.1787/d93ed7db-en): subsidies exceeding 15% of revenue are dominated by China-based firms in aluminium, cement, glass and semiconductors, https://www.oecd.org/en/publications/how-governments-back-the-largest-manufacturing-firms_d93ed7db-en.html. Report PDF: https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/02/how-governments-back-the-largest-manufacturing-firms_64f9eef0/d93ed7db-en.pdf.

[38] Non-Confidential Attachment B-3.1-5. OECD, Measuring distortions in international markets: the aluminium value chain (2019, DOI 10.1787/c82911ab-en): government support is especially heavy in the People's Republic of China and upstream subsidies confer significant support downstream, https://www.oecd.org/en/publications/measuring-distortions-in-international-markets-the-aluminium-value-chain_c82911ab-en.html. Report PDF: https://www.oecd.org/content/dam/oecd/en/publications/reports/2019/01/measuring-distortions-in-international-markets-the-aluminium-value-chain_058cb425/c82911ab-en.pdf.

[39] Non-Confidential Attachment B-3.1-6. The Aluminium Association, summarising OECD findings: of USD 70 billion provided to the seventeen largest aluminium firms (2013–17), 85% went to five Chinese-owned firms; below-market finance by state banks is a widespread China subsidy instrument that increases with state ownership, https://www.aluminum.org/news/new-oecd-analysis-shows-growing-role-state-enterprises-global-aluminum-market.

[40] Non-Confidential Attachment B-3.1-7. Global Aluminium Associations welcome new OECD data on industrial subsidies (2026 OECD MAGIC release): 2005–24 aluminium-sector subsidies USD 118.3bn, of which China USD 101.4bn (86%); 2024 subsidy share of revenue 4.4% (China) vs 0.5% (OECD); China's share of global primary aluminium output grew from 11% to 61%, https://www.lightmetalage.com/news/industry-news/global-aluminum-associations-welcome-new-oecd-data-on-industrial-subsidies/.

[41] Non-Confidential Attachment B-3.1-8. Aluminium associations of the US, Europe, Canada and Japan, joint press release on the 2026 OECD MAGIC database (European Aluminium), https://european-aluminium.eu/wp-content/uploads/2026/06/ALU-ASSO-OECD-MAGIC-Press-release_June-1-2026.pdf.

C of this application). Where silica sand is used instead, it is exposed to energy and processing distortions. CSR contends that if Chinese exporters are verified to use predominantly silica sand rather than fly ash, the energy and aluminium distortions are even more prevalent.

Gypsum

Gypsum, including synthetic desulphurisation gypsum recovered from the flue-gas scrubbing of coal-fired power stations, is a further input and is a cheaply and abundantly available by-product of subsidised power.

Energy

AAC manufacture is highly energy-intensive. The autoclaving process involves steam curing at approximately 190°C, in addition to ball-milling and pre-curing.[42] The OECD has found that support to Chinese heavy industry includes subsidised energy prices and input support at preferential or non-market rates, including energy and raw materials.[43] China's electricity market remains substantially administratively priced.

Land

Industrial land-use rights provided for less than adequate remuneration are a recurrent feature of Chinese industrial production and are repeatedly countervailed in China cases; the OECD records that preferential treatment of SOEs in land transactions persists in certain regions despite land reforms.[44]

Capital and finance

State-directed lending below market to building-materials producers distorts the cost of capital. The OECD has found that below-market finance is China's most widespread subsidy instrument and increases with state ownership.[45] The sector's exposure is illustrated by CNBM, whose net debt ratio stood at 86.6 percent in 2024 and whose principal bankers are major state banks.[46]

The CNBM Group and concentration of the AAC input markets

The China National Building Material Group Co., Ltd. (**CNBM Group**) is a centrally administered State-owned enterprise directly supervised by the State-owned Assets Supervision and Administration Commission (**SASAC**) of the State Council. It describes

[42] Non-Confidential Attachment B-3.1-9. Autoclaved aerated concrete, Wikipedia: steam-pressure hardening reaches 190°C and 800–1,200 kPa (8–12 bar), https://en.wikipedia.org/wiki/Autoclaved_aerated_concrete.
[43] Non-Confidential Attachment B-3.1-10. OECD, OECD Steel Outlook 2025: support measures include subsidised energy prices and input support at preferential or non-market rates, including land, energy and raw materials, https://www.oecd.org/en/publications/oecd-steel-outlook-2025_28b61a5e-en/full-report/a-level-playing-field-is-needed-for-a-brighter-outlook-in-the-global-steel-industry_28b44f35.html. Report PDF: https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/05/oecd-steel-outlook-2025_bf2b6109/28b61a5e-en.pdf.
[44] Non-Confidential Attachment B-3.1-11. OECD, The drivers and impacts of subsidies to steel firms (2025, DOI 10.1787/33e4b097-en): preferential treatment for SOEs in land transactions still exists in certain regions despite market-oriented land reforms, https://www.oecd.org/en/publications/the-drivers-and-impacts-of-subsidies-to-steel-firms_33e4b097-en/full-report/component-5.html.
[45] Non-Confidential Attachment B-3.1-6. The Aluminium Association, summarising OECD findings: of USD 70 billion provided to the seventeen largest aluminium firms (2013–17), 85% went to five Chinese-owned firms; below-market finance by state banks is a widespread China subsidy instrument that increases with state ownership, https://www.aluminum.org/news/new-oecd-analysis-shows-growing-role-state-enterprises-global-aluminum-market.
[46] Non-Confidential Attachment B-3.1-12. China National Building Material Company Limited, 2024 Annual Report (HKEX 03323): net debt ratio 86.6% (2024); SASAC ultimate controller, https://www.hkexnews.hk/listedco/listconews/sehk/2025/0327/2025032702837.pdf.

itself as *…China's largest comprehensive building materials industry group…* and is listed in the Fortune Global 500.[47] Through its listed flagship, China National Building Material Company Limited (**CNBM Co., Ltd.**, HKEX 03323), the group controls a vertically integrated portfolio spanning cement, gypsum board, lightweight and "new" building materials, glass fibre, and related engineering services.[48]

CNBM Co., Ltd. is controlled by the CNBM Group, which held approximately 45.02 percent of the company at 31 December 2024, increasing to approximately 50.01 percent by March 2025. The ultimate controller of the group is SASAC.[49] As approved by the State Council, the CNBM Group was created in 2016 through the merger of China National Building Materials Group Corporation and China National Materials Group Corporation (Sinoma), and in 2018 the listed subsidiaries (CNBM Co., Ltd. and Sinoma Co., Ltd.) were merged in a State Council–approved supply-side reform exercise consolidating state ownership of the building-materials sector.[50]

The vertically integrated CNBM structure relevant to the production of AAC and its principal inputs includes the following key entities:

- CNBM's cement business: the largest in China and the world, with group cement capacity of the order of 530 million tonnes, producing the primary calcareous binder used in AAC;[51]

- Beijing New Building Material Public Limited Company (BNBM): described by CNBM as its *…new materials platform…* and the world's largest gypsum-board group, with capacity of the order of 3.3 billion m².[52] Through its wholly-owned subsidiary Taishan Gypsum, it dominates Chinese gypsum supply and also produces mineral wool, insulation and other lightweight building materials.[53] Gypsum is a significant input to AAC; and

- CNBM's lightweight and new building materials segment and its engineering arm (associated with AAC production-line technology and supply).[54]

CSR contends that the centralised, SASAC-controlled CNBM Group is the dominant force in the principal cement and gypsum input markets for AAC, and has a coordinating presence

[47] Non-Confidential Attachment B-3.1-14. World Cement Association, member profile — China National Building Material Group: largest comprehensive building material group in China, Fortune Global 500; group cement capacity 530 million tonnes, ranking first globally, https://www.worldcementassociation.org/about-us/our-members/cnbm.
[48] Non-Confidential Attachment B-3.1-15. China National Building Material, Wikipedia: the largest cement and gypsum board producer in China; portfolio spanning cement, lightweight building materials, glass fibre and engineering services; 2 May 2018 CNBM/Sinoma share exchange, https://en.wikipedia.org/wiki/China_National_Building_Material.
[49] Non-Confidential Attachment B-3.1-12. China National Building Material Company Limited, 2024 Annual Report (HKEX 03323): parent holding 45.0192% at 31 December 2024, rising to ~50.01% after cancellation of 841,749,304 H shares on 12 March 2025; SASAC ultimate controller, https://www.hkexnews.hk/listedco/listconews/sehk/2025/0327/2025032702837.pdf.
[50] Non-Confidential Attachment B-3.1-15. China National Building Material, Wikipedia: the largest cement and gypsum board producer in China; portfolio spanning cement, lightweight building materials, glass fibre and engineering services; 2 May 2018 CNBM/Sinoma share exchange, https://en.wikipedia.org/wiki/China_National_Building_Material.
[51] Non-Confidential Attachment B-3.1-14. World Cement Association, member profile — China National Building Material Group: largest comprehensive building material group in China, Fortune Global 500; group cement capacity 530 million tonnes, ranking first globally, https://www.worldcementassociation.org/about-us/our-members/cnbm.
[52] Non-Confidential Attachment B-3.1-16. Beijing New Building Material Public Limited Company (BNBM), corporate profile: the new-materials platform of the CNBM Group and the world's largest gypsum-board group (business scale ~3.3 billion m²), https://www.bnbm.com/.
[53] Non-Confidential Attachment B-3.1-17. Global Gypsum, industry news: BNBM to hold the entire equity interest in Taishan Gypsum, consolidating the CNBM group's gypsum position, https://www.globalgypsum.com/news/itemlist/tag/CNBM.
[54] Non-Confidential Attachment C-1.1-5. AAC plant solution jointly developed with CNBM — industry description of CNBM's association with AAC production lines, https://cement-plants.com/aac-blocks-manufacturing-plant/.

across the building-materials value chain. Its central and vertically integrated position permits coordination of capacity additions, input procurement and pricing across that value chain in a manner that a private, market-based corporate group could not replicate.

In AAC, the Group's dominance is concentrated in the upstream inputs and bears directly on AAC given cement and gypsum are core AAC inputs. This concentration of state ownership and coordination in the AAC input markets is a feature of the Chinese PMS.

IV. Benchmark methodology

CSR proposes that normal values be constructed by displacing input costs found to be distorted by reference to external benchmarks. This is appropriate given, as shown above, the domestic Chinese market is affected by GOC involvement. These benchmarks could be formulated as follows:

- for the aluminium aeration agent: a benchmark built up from London Metal Exchange primary-aluminium prices;
- for cement, an appropriate regional or international cement benchmark;
- for electricity and gas, an undistorted regional tariff benchmark; and
- for industrial land, a third-country benchmark.

The use of external benchmarks where domestic prices are distorted by the government's predominant role is supported by the WTO public-body jurisprudence.[55]

V. Conclusion

CSR submits that GOC influence impacts every material cost driver of AAC in China. The two major inputs (cement and the aluminium aeration agent) being among the most heavily subsidised industries in the country, the siliceous and gypsum inputs flowing from subsidised coal power, and energy, land and capital each provided on terms shaped by the State.

The situation in the Chinese AAC market is therefore one in which costs and prices are not substantially the same as they would be in a competitive market. CSR submits that a PMS exists within s.269TAC(2)(a)(ii) such that domestic selling prices are not suitable for determining normal value, and that normal value should be constructed using the methodology above.

2. Specify the terms and conditions of the sale, where known.

Not applicable.

3. Provide supporting documentary evidence.

Not applicable.

[55] Non-Confidential Attachment B-3.1-13. WTO Appellate Body Report, US — Anti-Dumping and Countervailing Duties (China) (DS379): SOEs and state banks may be public bodies; external benchmarks may be used where the government's predominant role distorts domestic prices for goods, loans and land-use rights, https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds379_e.htm.

4. List the names and contact details of other known sellers of like goods in the domestic market of the exporting country.

Refer B-1.4.

B-4 Estimate of normal value using another method

This section is not mandatory. It need only be completed where there is no reliable information available about selling prices in the exporter's domestic market. Other methods of calculating a normal value include:

- the cost to make the exported goods plus the selling and adminstration costs (as if they were sold in the exporter's domestic market) plus an amount for profit (if applicable);
  OR
- the selling price of like goods from the country of export to a third country.

1. Indicate the normal value of the like goods in the country of export using another method (if applicable, use appendix B2 Constructed Normal Value).

As outlined in Section B-3 above, due to a PMS in the Chinese domestic market, CSR does not consider that domestic selling prices are suitable for establishing normal values under subsection 269TAC(1) of the Act. In the absence of suitable domestic sales, CSR has sought to construct normal values.

Given the submitted evidence referenced in section B-3 demonstrating that key raw materials are also impacted and distorted by Chinese Government interventions, CSR has constructed normal values on the basis of costs that reasonably reflect competitive market costs. CSR has relied on its own cost to make data for this purpose.

For conversion costs, and selling, general and administration (SG&A) expenses, CSR does not have access to Chinese costs. In the absence of this information, CSR has utilised its own conversion and SG&A costs, with adjustment made where relevant economic benchmarks are available.[56] A level of profit of 5.24 percent has been applied, sourced from the financial statements of CNBM Co. Ltd.

2. Provide supporting documentary evidence.

Supporting documentation has been provided at Confidential Attachment B-4.1.

[56] A downwards adjustment has been made for Chinese labour costs.

B-5 Adjustments

A fair comparison must be made between the export price and the normal value. Adjustments should be made for differences in the terms and circumstances of the sales such as the level of trade, physical characteristics, taxes or other factors that affect price comparability.

1. Provide details of any known differences between the export price and the normal value. Include supporting information, including the basis of estimates.

Normal values nominated in this application have been determined at the ex-factory level. Export prices for the goods exported to Australia from China have been determined at the FOB point, country of export.

Adjustments will be required for, inter-alia and specific to each exporter, domestic and export credit terms, and domestic and export packing, etc. CSR does not have details of such costs for Chinese exporters.

2. State the amount of adjustment required for each and apply the adjustments to the domestic prices to calculate normal values. Include supporting information, including the basis of estimates.

The above-noted adjustments have not been included.

B-6 Dumping margin

1. Subtract the export price from the normal value for each model control code of the goods (after adjusting for any differences affecting price comparability).

CSR has calculated prima facie dumping margins for AAC exported from China for the 12 months ending June 2026 as follows:

Quarter	Dumping Margin – A$/M3	Dumping Margin – % of export price
Jul. – Sept. 2025	$[*XXX*]	7.44%
Oct. – Dec. 2025	$[*XXX*]	12.40%
Jan. – Mar. 2026	$[*XXX*]	13.89%
Apr. – Jun. 2026	$[*XXX*]	22.88%

2. Show dumping margins as a percentage of the export price.

As shown above.

PART C

SUPPLEMENTARY SECTION

IMPORTANT

Replies to questions in Part C are not mandatory in all instances but may be mandatory for certain applications.

C-1 Subsidy

This section must be completed where countervailing duties are sought to offset foreign government assistance through subsidies to exporters or producers.

If the application is for countervailing duty alone, the domestic price information required by Part B of the application need not be supplied.

Responses to questions A-9 will need to identify the link between subsidisation and injury.

1. Identify the subsidy paid in the country of export or origin. Provide supporting evidence including details of:
   (i) the nature and title of the subsidy;
   (ii) the government agency responsible for administering the subsidy;
   (iii) the recipients of the subsidy; and
   (iv) the amount of the subsidy.

Countervailable Subsidies: China

I. Introduction

CSR submits that producers and exporters AAC in China have received, and continue to receive, countervailable subsidies from the GOC within the meaning of the *Customs Act 1901* (Cth) (**the Act**)[57] and A the WTO *Agreement on Subsidies and Countervailing Measures* (the SCM Agreement).[58]

CSR submits that the Chinese AAC industry is the beneficiary of central and provincial government support, such as grants, tax preferences, preferential lending, equity infusions, the provision of raw materials at less than adequate remuneration (**LTAR**), and a suite of other programs, that confer countervailable benefits on the goods exported to Australia.

In the application, CSR seeks to address (i) the nature and title of each subsidy; (ii) the administering government agency; (iii) the recipients; and (iv) the amount (so far as presently documentable). CSR is not of the view that any program is immaterial.

II. Previous Commission Findings

The Commission has consistently identified countervailable subsidies in the Chinese economy across a wide range of industries since 2010, including aluminium extrusions, hollow structural sections, hot-rolled coil, plate steel, metallic coated steel, upstream steel derivative items, and other manufactured goods.

Over this time, the Commission has made affirmative subsidy findings identifying recurring subsidy categories, including LTAR provision of primary inputs, preferential energy and electricity pricing, preferential lending by state owned commercial banks (**SOCBs**) treated as public bodies, industrial land use rights for LTAR, tax preferences, grants and similar programs, and VAT export rebate distortions. The methodologies developed in steel and the

[57] Customs Act 1901 (Cth), section 269T (definition of "subsidy"); section 269TAAC (countervailable subsidy).
[58] WTO Agreement on Subsidies and Countervailing Measures, Articles 1.1 (definition of subsidy: financial contribution by government conferring a benefit) and 2 (specificity). Available at: https://www.wto.org/english/docs_e/legal_e/24-scm.pdf.

aluminium extrusions series are directly applicable to this present application, given the overlapping industrial policy framework, the use of constructed external benchmarks, and the treatment of SOCBs as public bodies.

III. Program-by-program assessment

A countervailable subsidy under s269T(1) of the Act exists where (a) the government of the country of export provides a financial contribution; (b) the financial contribution confers a benefit; and (c) the subsidy is specific within the meaning of s 269TAAC.

Provision of inputs for LTAR

Condition	Details
Nature/title	Government or public-body provision of cement, aluminium powder/paste, fly ash, gypsum, electricity and coal below market rates.
Benefit	Measured against an external benchmark.
Specificity	De facto and/or through majority-government ownership of the suppliers as authorities.
Administering agencies	The relevant state-owned suppliers and their supervising authorities.
Recipients	Chinese AAC producers and exporters.
Direct evidence	OECD findings that cement, aluminium and energy are provided on subsidised terms in China;[59] the public-body jurisprudence.[60]

Land use rights for LTAR

Condition	Details
Nature/title	Provision of industrial land-use rights below market rates.
Benefit	Measured against an external benchmark.
Specificity	Regional or de jure where supply is confined to designated zones.
Administering agencies	SOEs, as repeatedly having been found to provide preferential treatment in land transactions.
Recipients	AAC plants situated in industrial parks/zones.

Preferential lending, directed credit and equity

Condition	Details
Nature/title	Below-market loans from state-owned banks, debt-to-equity swaps and capital injections.
Benefit	Finance rate differential to a market benchmark.
Specificity	De facto to encouraged sectors and state-owned recipients.
Administering agencies	SOCBs.
Recipients	Chinese AAC producers and exporters.
Direct evidence	The OECD finds below-market finance is China's most widespread subsidy instrument and rises with state ownership,[61] and CNBM's 86.6% net debt ratio and reliance on state banks illustrate the channel.[62]

[59] Non-Confidential Attachment B-3.1-3. OECD, OECD Steel Outlook 2025 (DOI 10.1787/28b61a5e-en): steel is comparable to other heavy industries such as aluminium, cement and shipbuilding; China's subsidisation rate is ten times that of OECD countries,

Grants

Condition	Details
Nature/title	Energy-saving and green-building grants, new wall material special funds, equipment and technical-upgrade grants, environmental grants, and provincial and local industrial-support grants.
Benefit	As a direct funds transfers, the benefit is the grant amount.
Specificity	By enterprise, industry or region.
Direct evidence	CNBM's audited disclosure of government grants of RMB 2.195 billion in 2024 (22.82 percent of total profit) and RMB 2.18 billion in 2023.[63] While CNBM is the building-materials SOE rather than the leading AAC exporter, its audited grants demonstrate the existence, scale and accounting of the Chinese AAC grant ecosystem.

Tax preferences — the resource-utilisation VAT immediate-refund

Condition	Details
Nature/title	VAT refund.
Benefit	Under MOF & STA Announcement No. 40 of 2021 (effective 1 March 2022), qualifying sales of self-produced comprehensive-resource-utilisation products attract an immediate VAT refund on a tiered basis.[64] The GOC contribution is revenue forgone. The benefit is the refunded VAT.
Specificity	By product catalogue.
Administering agencies	Ministry of Finance and State Taxation Administration (and local tax bureau).[65]
Recipients	Chinese AAC producers and exporters.
Direct evidence	The "new-type wall materials" catalogue carries a 50% immediate refund, whereas the 70% tier attaches to qualifying resource-utilisation products in which not less than 70% by weight of the raw materials are listed waste resources (fly ash, coal gangue). AAC made with not less than 70% fly ash or coal gangue qualifies for the 70% tier. This operates as a per-unit revenue subsidy on the finished good.

https://www.oecd.org/en/publications/oecd-steel-outlook-2025_28b61a5e-en/full-report/steel-subsidies-fuelling-excess-capacity_f46e3c40.html. Report PDF: https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/05/oecd-steel-outlook-2025_bf2b6109/28b61a5e-en.pdf.

[60] Non-Confidential Attachment B-3.1-13. WTO Appellate Body Report, US — Anti-Dumping and Countervailing Duties (China) (DS379): SOEs and state banks may be public bodies; external benchmarks may be used where the government's predominant role distorts domestic prices for goods, loans and land-use rights, https://www.wto.org/english/tratop_e/dispu_e/cases_e/ds379_e.htm.

[61] Non-Confidential Attachment B-3.1-6. The Aluminum Association, summarising OECD findings: of USD 70 billion provided to the seventeen largest aluminium firms (2013–17), 85% went to five Chinese-owned firms; below-market finance by state banks is a widespread China subsidy instrument that increases with state ownership, https://www.aluminum.org/news/new-oecd-analysis-shows-growing-role-state-enterprises-global-aluminum-market.

[62] Non-Confidential Attachment B-3.1-12. China National Building Material Company Limited, 2024 Annual Report (HKEX 03323): net debt ratio 86.6% (2024); SASAC ultimate controller, https://www.hkexnews.hk/listedco/listconews/sehk/2025/0327/2025032702837.pdf.

[63] Non-Confidential Attachment B-3.1-12. China National Building Material Company Limited, 2024 Annual Report (HKEX 03323): government grants RMB 2.195 billion (2024, 22.82% of total profit) and RMB 2.18 billion (2023); SASAC ultimate controller, https://www.hkexnews.hk/listedco/listconews/sehk/2025/0327/2025032702837.pdf.

[64] Non-Confidential Attachment C-1.1-3. Explanation of MOF & STA Announcement No. 40 of 2021 (comprehensive resource-utilisation VAT), National Development and Reform Commission (NDRC); effective 1 March 2022, https://www.ndrc.gov.cn/xwdt/ztzl/tdjdxf/202203/t20220323_1320112.html.

[65] Non-Confidential Attachment C-1.1-4. State Taxation Administration (Shanghai), guidance implementing the resource-utilisation VAT immediate-refund policy and 2022 Catalogue (fly ash, coal gangue), https://shanghai.chinatax.gov.cn/xwdt/ztzl/ssyhzl/node5244/node5204/.

Enterprise income tax preferences

Condition	Details
Benefit	Reduced 15% High and New Technology Enterprise rate, resource-utilisation income reductions, accelerated depreciation and R&D super-deductions.
Specificity	De jure or de facto.

IV. Company-specific evidence

As noted in Part B of the application, CNBM Co. Ltd. is controlled by China National Building Material Group, whose ultimate controller is the State-owned Assets Supervision and Administration Commission (SASAC). The parent held 45.01 percent of CNBM at 31 December 2024, increasing to approximately 50.01 percent in March 2025.[66] In 2024 CNBM recorded government grants of RMB 2.195 billion (22.82 percent of total profit); its subsidiaries produce cement, gypsum board and lightweight building materials, and CNBM is associated with AAC plant technology and supply.[67] CNBM is the relevant foundation SOE anchor for the building-materials subsidy ecosystem.

CSR understands that the Chinese AAC export field is fragmented and substantially private or unlisted. Identified exporters include Shandong Sinomega Innovative Material Co., Ltd. and Sinomega House (Qingdao) Co., Ltd. (the latter offering Hebel-style B05 AAC blocks for export).[68] Direct subsidy disclosures for such private firms are, however, limited.

V. Industrial-plan context

The AAC subsidy ecosystem is premised on published industrial policy, with the 14th Five-Year Plan for Building Energy Conservation and Green Building Development (MOHURD, effective April 2022) and related MIIT/MOHURD policies promoting prefabricated and green building and "new-type wall materials". AAC is a flagship of these. This planning context both establishes government direction of the sector and channels the grants and tax preferences detailed above.

VI. China's Subsidy Notification

China's 30 June 2025 notification is its most recent and full notification to the WTO's Committee on Subsidies and Countervailing Measures. This notification, pursuant to Article XVI:1 of the GATT 1994 and Article 25 of the SCM Agreement, advises the Committee of China's subsidisation policies. However, WTO members have publicly questioned China about the lack of transparency of its subsidy programs, as well as the comprehensiveness of its subsidy notification.[69]

In this notification, China identifies subsidies available at the central and sub-central levels of government which take the form of cash grants, land-use rights, discounted inputs,

[66] Non-Confidential Attachment B-3.1-12. China National Building Material Company Limited, 2024 Annual Report (HKEX 03323): parent holding 45.0192% at 31 December 2024, rising to ~50.01% after cancellation of 841,749,304 H shares on 12 March 2025; SASAC ultimate controller, https://www.hkexnews.hk/listedco/listconews/sehk/2025/0327/2025032702837.pdf.
[67] Non-Confidential Attachment C-1.1-5. AAC plant solution jointly developed with CNBM — industry description of CNBM's association with AAC production lines, https://cement-plants.com/aac-blocks-manufacturing-plant/.
[68] Non-Confidential Attachment C-1.1-6. Chinese AAC suppliers/exporters listing (incl. Sinomega House (Qingdao) offering "Hebel B05" AAC blocks), Ecer.com, https://www.ecer.com/china-autoclaved-aerated-concrete.
[69] Refer Simon Lester, *WTO Members Discuss Transparency of China's Subsidy Notification*, China Trade Monitor, (December 15, 2021), at https://www.chinatrademonitor.com/wto-members-discuss-transparency-of-chinas-subsidy-notifications/

preferential loans and directed credit, special tax rebates, and VAT and tariff exemptions. Publicly available evidence indicates that these programs may confer countervailable subsidies to producers of the AAC goods in China, as they are financial contributions, provide benefits, and are specific.

In particular, CSR requests that the Commission investigate whether Chinese AAC producers benefit from any of the subsidies listed in the Notification.

VII. Conclusion – China

CSR has set out above the argument that Chinese exporters of AAC benefit from a substantial catalogue of countervailable subsidies. The programs operate at various GOC levels (central, provincial and municipal) and across various categories (LTAR, grants, tax preferences, preferential lending, and equity programs.

CSR therefore respectfully requests that the Commission to:

- initiate an investigation into the subsidisation of AAC exported from China and into each of the programs identified above;

- issue a GOC directed to the ownership and pricing of the cement, aluminium powder/paste, fly ash, gypsum, electricity and coal suppliers; land-use-right provision and pricing; preferential lending and equity; grant programmes; the operation of, and amounts refunded under the resource-utilisation VAT instrument, and any other programs; and

- issue exporter questionnaires directed to each exporter's input prices and supplier ownership, land-use-right acquisition prices, loan terms, grants received, and VAT refunds and income-tax preferences received.

C-2. Threat of material injury

You must complete this section if the application includes a claim that material injury is threatened to an Australian industry because of the exportation of goods into the Australian market.

Not applicable.

1. Identify the change(s) in circumstances that would make material injury foreseeable and imminent unless dumping or countervailing measures were imposed, for example by having regard to:
   (i) the rate of increase of dumped/subsidised imports;
   (ii) changes to the available capacity of the exporter(s);
   (iii) the prices of imports that will have a significant depressing or suppressing effect on domestic prices and lead to further imports;
   (iv) inventories of the product to be investigated;
   (v) for applications claiming subsidisation, the nature of the subsidies in question and the trade effects likely to arise therefrom; or
   (vi) any other relevant factor(s).

2. If appropriate, include an analysis of trends (or a projection of trends) and

market conditions illustrating that material injury is both foreseeable and imminent.

C-3. Close processed agricultural goods

Where it is established that the like (processed) goods are closely related to the locally produced (unprocessed) raw agricultural goods, then – for the purposes of injury assessment – the producers of the raw agricultural goods form part of the Australian industry. This section is to be completed only where processed agricultural goods are the subject of the application**.**
Applicants are advised to contact the Commission's client support section before completing this section.

1. Fully describe the locally produced raw agricultural goods.

2. Provide details showing that the raw agricultural goods are devoted substantially or completely to the processed agricultural goods.

3. Provide details showing that the processed agricultural goods are derived substantially or completely from the raw agricultural goods.

4. Provide information to establish **either**:

   - a close relationship between the price of the raw agricultural goods and the processed agricultural goods; **or**

   - that the cost of the raw agricultural goods is a significant part of the production cost of the processed agricultural goods.

C-4. Exports from a non-market economy

Complete this section only if exports from a non-market economy are covered by the application. The domestic price information required by Part B of the application need not be supplied if this question is answered.

Normal values for non-market economies may be established by reference to selling prices or to costs to make and sell the goods in a comparable market economy country.

1. Provide evidence the country of export is a non-market economy. A non-market economy exists where the government has a monopoly, or a substantial monopoly, of trade in the country of export and determines (or substantially influences) the domestic price of like goods in that country.

2. Nominate a comparable market economy to establish selling prices.

3. Explain the basis for selection of the comparable market economy country.

4. Indicate the selling price (or the cost to make and sell) for each model control code of the goods sold in the comparable market economy country. Provide

supporting evidence.

C-5 Exports from an 'economy in transition'

An 'economy in transition' exists where the government of the country of export had a monopoly, or substantial monopoly, on the trade of that country (such as per question C-4) and that situation no longer applies.
Complete this section only if exports from an 'economy in transition' are covered by the application.

Applicants are advised to contact the Commission's client support section before completing this section

1. Provide information establishing that the country of export is an 'economy in transition'.

2. A price control situation exists where the price of the goods is controlled or substantially controlled by a government in the country of export. Provide evidence that a price control situation exists in the country of export in respect of like goods.

3. Provide information (reasonably available to you) that raw material inputs used in manufacturing/producing the exported goods are supplied by an enterprise wholly owned by a government, at any level, of the country of export.

4. Estimate a 'normal value' for the goods in the country of export for comparison with export price. Provide evidence to support your estimate.

C-6 Aggregation of Volumes of dumped goods

Only answer this question if required by question B-1.5 of the application and action is sought against countries that individually account for less than 3% of total imports from all countries (or 4% in the case of subsidised goods from developing countries). To be included in an investigation, they must collectively account for more than 7% of the total (or 9% in the case of subsidised goods from developing countries).

	Quantity	%	Value	%
All imports into Australia		100%		100%
Country A*				
Country B*				
etc*				
Total				

* Only include countries that account for less than 3% of all imports (or 4% in the case of subsidised goods from developing countries). Use the data at Appendix A.2 (Australian Market) to complete the table.

APPENDICES

Appendix A1	Australian Production
Appendix A2	Australian Market
Appendix A3	Sales Turnover
Appendix A4	Domestic Sales
Appendix A5	Sales of Other Production
Appendix A6.1	Cost to Make and Sell (& profit) Domestic Sales
Appendix A6.2	Cost to Make and Sell (& profit) Export Sales
Appendix A7	Other Injury Factors
Appendix A8	Authority to Deal With Representative
~~Appendix B1~~	~~Deductive Export Price~~
~~Appendix B2~~	~~Constructed Normal Value~~