

## **InfraBuild response to the anonymous author of *Submission No. 60***

InfraBuild is Australia's largest manufacturer of long steel products producing a range of products that are essential for Australia's infrastructure, construction, mining, manufacturing and energy industries.

The key products that InfraBuild manufactures for the fabricated steel market that are relevant to the Productivity Commission's inquiry, are light structural sections range commonly known as Merchant Bar and pipe and tubular sections known as Hollow Structural Sections. InfraBuild is also a major distributor of a range of structural steel products to the fabrication industry.

InfraBuild welcomes the opportunity to respond to the concerns raised by the anonymous author of *Submission No. 60 (SUB 60)* regarding the operation of Australia's anti-dumping framework and its alleged impact on steel supply and competitiveness of the downstream fabrication market.

The anonymous author of SUB 60 focuses on steel reinforcing bar, despite the fact that it is not commonly imported as fabricated structures. While we acknowledge the supply pressures currently being experienced in the market for some steel products, it is essential that these issues are understood in their proper factual and economic context.

### **Current supply constraints are temporary and operational and not caused by anti-dumping measures**

The tight supply of certain steel products currently affecting the downstream market are the result of unplanned outages at the Whyalla Steelworks<sup>1</sup> and the global supply disruptions caused by the conflict in the Middle East. InfraBuild is actively addressing these short-term constraints for the products that it produces by:

- expanding its own steelmaking capacity.
- purchasing supplementary imported material to fill a short-term gap.

These actions demonstrate that the current supply pressures for the products that InfraBuild produces are transitional and unrelated to the existence of anti-dumping duties.

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<sup>1</sup> Owned and operated by OneSteel Manufacturing Pty Limited (Administrators Appointed)

## **Anti-dumping duties do not prevent imports into Australia**

A fundamental point must be clarified, anti-dumping duties<sup>2</sup> do not stop imported goods from being exported to Australia. They simply apply a remedy in the form of a special tariff to address the *dumped component* of the export price. It is important to note that:

- Where an exporter has not been found to be dumping, no anti-dumping duties applies.
- Exporters found to be dumping may continue to supply the Australian market; they are simply required to price fairly.
- Importers who buy from these mills are also able to apply for duty refunds if the exporter is either no longer dumping or dumping at reduced levels. There is no reciprocal obligation for them to pay additional duty where the exporter dumps at more aggressive levels.

The anti-dumping system ensures fairer competition; it does not close the market or create monopolies.

## **There are many accredited overseas mills that can export reinforcing bar and structural steel products to the Australian market without any anti-dumping duties**

Publicly available third-party accreditation data<sup>3</sup> clearly demonstrates the breadth of supply options available to Australian importers and downstream fabricators and processes.

- There are 11 overseas mills across Asia and the Middle East that hold active third-party accreditation to supply Hot Rolled Structural Sections to Australia for which no anti-dumping measures apply.
- There are 17 overseas mills across Asia and the Middle East that hold active third-party accreditation to supply Hollow Structural Sections to Australia for which no anti-dumping measures apply.
- There are 13 overseas mills across Europe, the Middle East, Asia and the Pacific that currently hold active third-party accreditation to supply rebar in coil to Australia for which no anti-dumping measures apply.

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<sup>2</sup> Although the expression “anti-dumping duties” also includes countervailing duties, for the purpose of this response we are confining our commentary to dumping duties.

<sup>3</sup> <https://steelcertification.com/search-product>

- There are 14 overseas mills across Europe, the Middle East, Asia and the Pacific currently hold active third-party accreditation to supply rebar in straight lengths to Australia for which no anti-dumping measures apply.

Imports of reinforcing bar steel into Australia are currently at some of the highest levels on record, further demonstrating that anti-dumping measures are not restricting supply and that the Australian market is highly competitive.

### **Current import challenges are driven by global disruptions, not anti-dumping measures**

The primary constraints on imported steel availability at present are global geopolitical and logistical disruptions, including:

- the conflict in the Middle East
- shipping route instability
- extended transit times and elevated freight costs

These global factors, not Australia's anti-dumping framework, are the main reasons importers are currently experiencing some difficulty sourcing imported reinforcing bar and other steel products.

### **A viable domestic steel industry is essential for national resilience**

The current situation highlights the importance of maintaining a strong domestic steel industry. Without local production, the impact of global disruptions would be significantly more severe.

Anti-dumping measures help ensure that Australian producers are not seriously injured by unfairly traded imports, thereby:

- preserving sovereign capability
- supporting supply resilience
- ensuring long-term security of supply for critical infrastructure

### **Multiple anti-dumping applications reflect importer behaviour—not misuse of the system**

The submission suggests that repeated applications by Australian industry indicate a flaw in the anti-dumping framework. In reality, multiple applications occur because importers continually shift to new sources of dumped product even before measures are imposed.

This dynamic is well-documented. As Croft Traders explained during the Productivity Commission Public hearings.

*But then what happens too is, when you put up a dumping case, while that's going on, the group, us steel traders, get quite innovative and find other mills. That brings in a whole new range of mills. You'll end up with mills from India, Bahrain, UAE, Oman, China.*

This statement directly illustrates that importer behaviour, not domestic industry conduct, drives the need for multiple applications, as traders actively establish new sources of dumped product even before an investigation is completed.

Other “innovative” behaviour that importers use to evade paying duties on dumped goods includes masking trade data which is required to lodge anti-dumping or circumvention applications. The Anti-Dumping Commission requires applicants to provide four (4) years of individual country trade statistics of the goods by volume and value. Trade data at this level does not identify an individual company or person’s confidential information.

In March 2026, following requests from importers and exporters, the Australian Bureau of Statistics confidentialised import data for nearly all major steel product categories across all countries.

The attached ABS document promotes this service to companies to avoid being the subject of an anti-dumping duty inquiry or from countries that may be politically sensitive.

*There are many reasons for requests for confidentiality, for example:*

*..... an imported commodity may be the subject of an anti-dumping inquiry; or  
exports to or imports from certain countries may be politically sensitive<sup>4</sup>*

The process by which the ABS determines whether to apply confidentiality is itself confidential and non-contestable.

Going forward this leaves Safeguard Inquires as the only available trade remedy action available to Australian industry for these confidentialised products.

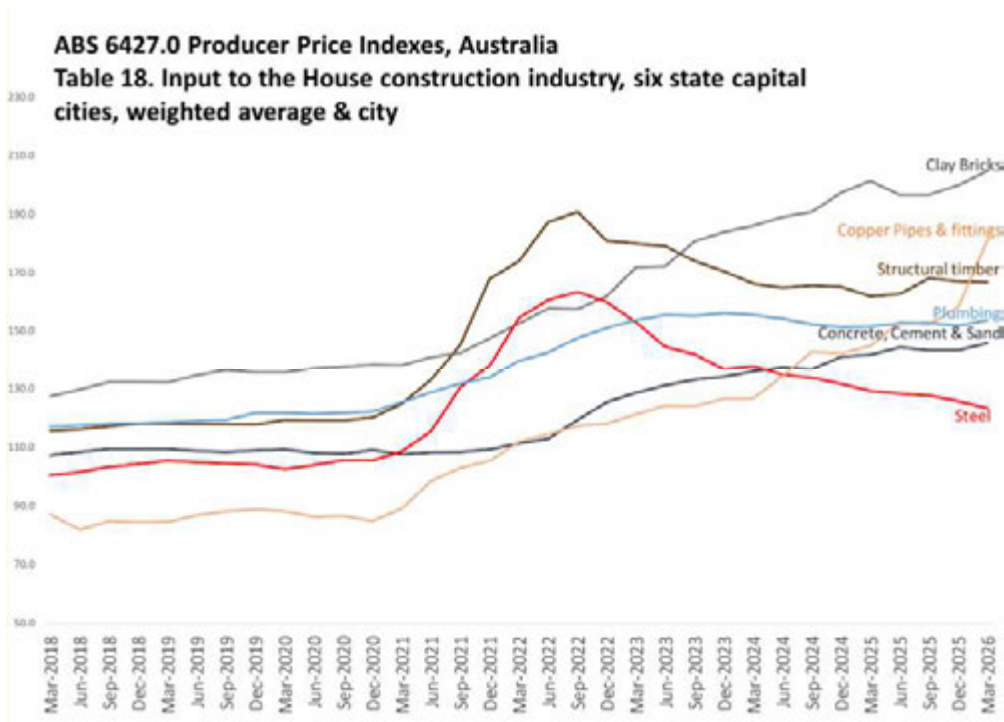
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<sup>4</sup> Australian Bureau of Statistics, *International Trade Requests To Confidentialise Data*, [https://www.abs.gov.au/ausstats/abs@.nsf/0/8474db3056f901edca256fbc0075a672/\\$FILE/Requests%20%20to%20Confidentialise%20data%201.pdf](https://www.abs.gov.au/ausstats/abs@.nsf/0/8474db3056f901edca256fbc0075a672/$FILE/Requests%20%20to%20Confidentialise%20data%201.pdf) (accessed 12 June 2026), p. 2.

## Summary

The concerns raised in SUB 60 conflate temporary operational issues and global supply disruptions with the operation of Australia’s anti-dumping framework. The evidence clearly shows that:

- anti-dumping duties do not prevent imports
- duties apply only to exporters found to be dumping
- the vast majority of accredited mills face no duties
- imports remain at historically high levels
- global geopolitical and shipping disruptions, not anti-dumping measures, are driving current supply challenges
- importer behaviour drives the need for multiple applications
- a strong domestic industry is essential for supply security
- the “Steel” price index within the PPI has been tracking downward post COVID indicating healthy price competition within supply



InfraBuild supports a fair, rules-based trading system that ensures competition occurs on a level playing field. The anti-dumping framework is a necessary and proportionate tool to prevent injury from unfairly traded imports and to safeguard Australia’s sovereign steelmaking capability.

Australia’s use of the anti-dumping system reflects:

- an open and highly competitive market
- a commitment to a rule based international trading system

The fact that so many exporters have been found to be dumping, i.e. selling into Australia at prices lower than in their own domestic markets, demonstrates the intensity of competition in the Australian market, not any lack of it