

**Exporter Questionnaire**

**Case number:** 621

**Product:** Wind Towers

**From:** The People’s Republic of China

**Response due by:** 19 June 2023

**Email enquiries to:** [investigations3@adcommission.gov.au](mailto:investigations3@adcommission.gov.au)

**Anti-Dumping Commission website:** [www.adcommission.gov.au](http://www.adcommission.gov.au)

**Responses to the exporter questionnaire must be submitted via SIGBOX. Please contact the commission on the above email address to request access to SIGBOX.**

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# Instructions

**Why you have been asked to fill out this questionnaire?**

The Anti-Dumping Commission (the commission) is conducting a continuation inquiry of the   
anti-dumping measures for wind towers exported to Australia from the People’s Republic of China (China).

The commission will use the information you provide to assess whether material injury will continue or recur if the anti-dumping measures expire.

The commission will collect and use information in accordance with the commission’s Collection and Use of Information Policy.Any information provided may be used by the Commission for any purpose consistent with its statutory functions.

**What happens if you do not respond to this questionnaire?**

You do not have to complete the questionnaire. However, if you do not respond, do not provide all the information sought, do not provide information within a reasonable time period, or do not allow the commission to verify the information, we may deem your company to be an uncooperative exporter. In that case we may replace the information we requested in the questionnaire with all relevant information, including information contained in the application, other questionnaire responses and other secondary sources.

Therefore, it is in your interest to provide a complete and accurate response to this exporter questionnaire, capable of verification.

**Extension requests**

If you require a longer period to complete your response to this exporter questionnaire, you must submit a request to the commission, in writing, for an extension to the due date for all or part of the questionnaire. This request must be made prior to the due date. A request for extension will be rejected if received after the due date.

When considering the extension request, the commission will have regard to:

* the commission’s responsibility to conduct the case in a timely and efficient manner;
* the reasons why you could not provide a response within the whole period and not only the period remaining between the request and the due date;
* ordinary business practices or commercial principles;
* the commission’s understanding of the relevant industry;
* previous correspondence and previous dealings with your company; and
* information provided by other interested parties.

More information on extensions can be found in the Customs (Extension of Time and Non-cooperation) Direction 2015 at <https://www.legislation.gov.au/Details/F2015L01736>.

You will be informed of the decision whether your request for an extension has been rejected, granted in full or granted in part. For example, you may be granted an extension to submit all sections except for Section A or you may be granted a shorter extension than you requested.

A summary of any requests and grants of extensions to submit a response to this exporter questionnaire will be published in the public record.

**Submitting a response to the exporter questionnaire**

Responses to the exporter questionnaire should be lodged via email or SIGBOX, a secure online document repository. Please contact the commission on the email address listed on the cover page to request access to SIGBOX.

**Confidential and non-confidential responses**

You are required to lodge a confidential version (OFFICIAL: Sensitive) and a non-confidential version (for publishing on the public record) of your response to this exporter questionnaire by the due date. Please ensure that *each page* of information you provide is clearly marked either   
“**OFFICIAL: Sensitive**” or “**PUBLIC RECORD**”.

All information provided to the commission in confidence will be treated accordingly. The public record version of your questionnaire will be placed on the public record, and must contain sufficient detail to allow a reasonable understanding of the substance of the information without breaching confidentiality.

A person is not required to provide a summary for the public record if the commission can be satisfied that no such summary can be given that would allow a reasonable understanding of the substance of the information.

All questionnaires are required to have a bracketed explanation of deleted or blacked out information for the public record version of the questionnaire. An example of a statement to accompany deleted/blacked out text is:

[Explanation of cost allocation through the divisions, by reference to machine hours or weight].

If such an explanation is not provided, the commission may disregard the information in the submission. Where the public record version of your response to the exporter questionnaire does not contain sufficient detail, your company may be requested to resubmit your response with the required level of detail or, if deadlines have passed, the Commission may not have regard to it.

**Verification of the information that you supply**

The commission may wish to verify your questionnaire response for completeness, relevance and accuracy.

The verification is not meant to be a chance for you to provide new or additional information. The Commission expects your response to the questionnaire to be relevant, complete, and accurate.

Note that the Commission may disregard any data or information that is not verified, including new or additional information provided after verification.

For information on the Commission’s verification procedures, refer to ADN 2016/30 available on the Commission’s website.

**Important instructions for preparing your response**

* All questions in this exporter questionnaire must be completed. If a question is not applicable to your situation, please answer the question with “Not Applicable” and provide an explanation as to why.
* All questions must be answered in English. An English translation must be provided for documents not originally in English. To the extent that the foreign language version differs, the English translation will be given priority as a matter of interpretation in Australia.
* Clearly identify all units of measurement (e.g. KG) and currencies (e.g. AUD) used. Apply the same measurement consistently throughout your response to the questionnaire.
* Label all attachments to your response according to the section of the questionnaire it relates.
* If you have used formulas to complete spreadsheets, these formulas must be retained and not hard-coded.
* You must retain all worksheets used in answering the questionnaire. Be prepared to provide these worksheets during the Commission’s verification of your data.
* If you cannot present electronic data in the requested format contact the case officer as soon as possible.

# Checklist

This section is an aid to ensure that you have completed all sections of this questionnaire.

|  |  |
| --- | --- |
| **Section** | Please tick if you have responded to all questions |
| Section A Company information |  |
| Section B Australian market |  |
| Section C Exported goods & like goods |  |
| Section D Domestic market |  |
| Section E Production |  |
| Section F  Supply and demand factors |  |
| Exporter's declaration |  |
| Non-confidential version of this response |  |

# Goods under consideration / Goods subject to Anti-dumping measures

The goods subject to anti-dumping measures (the goods) are:

*Certain utility scale wind towers, whether or not tapered, and sections thereof (whether exported assembled or unassembled), and whether or not including an embed being a tower foundation section.*

*Wind turbines that have electrical power generation capacities equal to or in excess of 1.00 megawatt (MW) and with a minimum height of 50 metres measured from the base of the tower to the bottom of the nacelle (i.e. where the top of the tower and nacelle are joined) when fully assembled.*

*A wind tower section consists of, at a minimum, multiple steel plates rolled into cylindrical or conical shapes and welded together (or otherwise attached) to form a steel shell, regardless of coating, end-finish, painting, treatment or method of manufacture, and with or without flanges, doors, or internal or external components (e.g., flooring/decking, ladders, lifts, electrical junction boxes, electrical cabling, conduit, cable harness for nacelle generator, interior lighting, tool and storage lockers) attached to the wind tower section.*

Additional information

Goods specifically excluded from the scope are nacelles and rotor blades, regardless of whether they are attached to the wind tower. Any internal or external components which are not attached to the wind towers or sections thereof are also excluded.

The goods may be classified to 7308.20.00 in Schedule 3 to the Customs Tariff Act 1995 (see below). This applies to complete towers, unassembled or assembled, and applies to a basic tower that includes doors, ladders, landings and embed or tower foundation. Steel tower sections, including sections with doors etc. are classified to 7308.90.00, assembled or disassembled, provided there aren’t enough in a shipment to be judged to be a complete tower.

Combinations of towers and tower sections may vary on a case by case basis for assessment of tariff classification. Classification may vary when there is more of one item than another, for example a tower section and lift or a tower section with lift, electrical junction boxes and other equipment. An assembled complete wind powered generator is a composite machine consisting of two or more machines fitted together to form a whole; wind engine, generator, gearbox, yaw controls etc. fitted in a steel tower and nacelle, and has a classification to subheading 8502.31.10.

Tariff classifications

The goods, as per the description above, may be classified to tariff subheadings 7308.20.00 (statistical codes 03 and 04); 7308.90.00 (statistical codes 52, 53, 54, 55, 56, 63 and 65); and 8502.31.10 (statistical code 31) in Schedule 3 to the *Customs Tariff Act 1995*.

# Section A Company information

## A-1 Company representative and location

1. Please nominate a contact person within your company:

Name:

Position in the company:

Telephone:

E-mail address:

1. If you have appointed a representative, provide their contact details:

Name:

Address:

Telephone:

E-mail address:

*In nominating a representative, you are granting authority to the commission to discuss matters relating to the case with the nominated representative, including your company’s confidential information.*

1. Please provide the location of where your company’s financial records are held.
2. Please provide the location of where your company’s production records are held.
3. Please provide the location of your company’s production plant manufacturing the goods under consideration.

## A-2 Company information

1. What is the legal name of your business?
2. Does your company trade under a different name and/or brand? If yes, provide details.
3. Was your company ever known by a different legal and/or trading name? If yes, provide details
4. Provide a list of your current board of directors and any changes in the last two years.
5. Is your company part of a group (e.g. parent company with subsidiaries, common ownership, joint ventures)? If yes, provide:
   1. A diagram showing the complete ownership structure; and
   2. A list of all related companies and its functions
6. Is your company or parent company publicly listed?

If yes, please provide:

* 1. The stock exchange where it is listed; and
  2. Any principal shareholders[[1]](#footnote-2)

If no, please provide:

1. A list of all principal shareholders and the shareholding percentages.
2. What is the overall nature of your company’s business? Include details of the products that your company manufactures and sells and the market your company sells into.
3. If your business does not perform all of the following functions in relation to the goods under consideration, then please provide names and addresses of the companies which perform each function:
4. produce or manufacture;
5. sell in the domestic market;
6. export to Australia; and
7. export to countries other than Australia.
8. Provide your company’s internal organisation chart.
9. Describe the functions performed by each group within the organisation.
10. Does your company produce brochures, pamphlets or other promotional material? If yes, please provide them.

# Section B AUSTRALIAN MARKET

## B-1 Australian exports

Please provide the names, contacts, email addresses, and telephone numbers of all Australian importers of your company’s goods for the period 1 July 2021 to 31 December 2022.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **No.** | **Importer’s name** | **Contact person** | **Email address** | **Area code and telephone number** |
| **1** |  |  |  |  |
| **2** |  |  |  |  |
| **3** |  |  |  |  |

## B-2 Australian export sales process

1. Provide details (and diagrams if appropriate) of the export sales process of your company and representatives (e.g. agents) including:
   1. Marketing and advertising activities
   2. Price determination and/or negotiation process
   3. Order placement process
   4. Order fulfilment process and lead time
   5. Delivery terms and process
   6. Invoicing process
   7. Payment terms and process
2. Does your organisation/business entity engage in the tender process for new wind tower projects?
   1. If yes, please explain your tender process.
   2. What elements are taken into account in tender bids – eg: price, lead times, technical specifications, transportation distance etc.
   3. Provide details of all tenders submitted for the period 1 July 2021 to   
      31 December 2022, including unsuccessful tenders.

## B-3 Prevailing conditions of competition in the Australian market

1. Describe the Australian market for the goods and the prevailing conditions of competition within the market, including:
   1. Provide an overall description of the Australian market for the goods which explains its main characteristics and trends over the past five years;
   2. Provide the sources of demand for the goods in Australia, including the categories of customers, users or consumers of the product;
   3. Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b);
   4. Describe the factors that influence consumption/demand variability in Australia, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production;
   5. Provide details of any government regulations that affect consumption/supply/demand in the Australian market;
   6. Describe any market segmentations in Australia; such as geographic or product segmentations;
   7. Provide an estimated proportion of sales revenue from each of the market segments listed in (f);
   8. Describe the way in which Australian manufactured and other imported goods compete in the Australian market;
   9. Describe the ways that the goods are marketed and distributed in the Australian market; and
   10. Describe any other factors that are relevant to characteristics or influences on the market for the goods in Australia.

*Provide documentary evidence to support the responses made to questions 1(a) to (j).*

1. Provide a diagram which describes the Australian market structure for the goods, ensuring that all the categories of participants are included. In this diagram use linkages to illustrate the different levels of trade and distribution channels within the Australian market.
2. Describe the regulatory framework of the Australian market for the goods as it relates to competition policy, taxation, product standards and the range of the goods. Provide a copy of any regulation described, if available.
3. Describe any entry restrictions for new participants into the Australian market for the goods. Your response could include information on:

* resource ownership;
* patents and copyrights;
* licenses;
* barriers to entry;
* import restrictions; and
* government regulations (including the effect of those government regulations).

## B-4 Goods in the Australian market

1. Generally describe the range of the goods offered for sale in the Australian market. The description should include all goods under consideration including those produced by your company. Your description could include information about:

* quality differences;
* price differences;
* supply/availability differences;
* technical support differences;
* the prevalence of private labels/customer brands;
* the prevalence of generic or plain labels;
* the prevalence of premium labels; and
* product segmentation.

1. Describe the key product attributes that influence purchasing decisions or purchaser preferences in the Australian market. Rank these preferences or purchasing influencers in order of importance.
2. Have there been any changes in market or consumer preferences in the Australian market for the goods in the last five years? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response.

## B-5 Relationship between price and cost in Australia

1. Describe the importance of the Australian market to your company’s operations. In your response describe:
   1. The proportion of your company’s sales revenue derived from sales of the goods in Australia; and
   2. The proportion of your company’s profit derived from sales of the goods in Australia.

*In responding to question 1 please provide evidence supporting calculations.*

1. Describe the nature of your product pricing (e.g., market penetration, inventory clearance, product positioning, price taker, price maker, etc.) and your price strategies (e.g., competition-based pricing, cost-plus pricing, dynamic pricing, price skimming, value pricing, penetration pricing, bundle pricing, etc.) in Australia. If there are multiple strategies applied, please rank these by importance. If there are different strategies for different products, please specify these. Provide copies of internal documents which support the nature of your product pricing.
2. Explain the process for how the selling prices of the goods for the Australian market by your business are determined. Provide copies of internal documents which support how pricing is determined.
3. How frequently are your Australian selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review. Provide the names and positions of all persons involved.
4. Rank the following factors in terms of their influence on your pricing decisions in the Australian market, with the most important factor ranked first and the least important factor ranked last:

* Competitors’ prices
* Purchase price of raw materials
* Cost to make and sell the goods
* Level of inventory
* Value of the order
* Volume of the order
* Value of forward orders
* Volume of forward orders
* Customer relationship management
* Supplier relationship management
* Desired profit
* Other [please define what this factor is in your response]

1. Describe the relationship between selling price and costs to make and sell in the Australian market. Does your company maintain a desired profit margin for the goods? If not, does your company seek to maintain a desired profit margin for the goods? Provide copies of internal documents which support your response to this question.
2. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the Australian market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.
3. Do you offer bundled pricing in the Australian market? If yes, explain how the pricing for bundled sales is determined. Explain how the costs to make and sell are considered in establishing these bundled prices for the goods. Provide copies of internal documents which support your claims in response to this question.
4. Does the volume of sales to a customer or the size of an order influence the selling price? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume-based prices for the goods. Provide copies of internal documents which support your claims in response to this question.
5. Does your organisation/business entity use sales contracts in the Australian market? If yes:
6. What proportion of your sales revenue would come from contracted sales versus uncontracted sales?
7. Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?
8. How frequently are sales contracts renegotiated?
9. How frequently are price reviews conducted between contracts?
10. Do you provide opportunities for price reviews for customers within contracts? If yes, provide a description of the process and an explanation of the circumstances that might lead to a price review.
11. Do changes in your costs to make and sell enable you to review prices for customers within contracts?
12. Provide a list of the customers under contract for the period 1 July 2021 to   
    31 December 2022 and copies of the two largest contracts in terms of sales revenue.
13. Provide copies of any price lists for the goods used in the Australian market for the period   
    1 July 2021 to 31 December 2022. If you do not use price lists, describe the transparency of your prices in the Australian market.
14. How do you differentiate pricing for different products/models of the goods in the Australian market? Describe how your products are grouped for price differentiation and the methodology used. Describe any cost to make or selling cost differences between differentiated products. Describe how these cost differences (if any) influence pricing decisions. Provide copies of internal documents which support your claims in response to this question.
15. Do you tier or segment your Australian customers for the goods in terms of pricing? If yes, provide:
    1. a general description of how this is done;
    2. list the factors that influence pricing differentiation in different tiers or segments; and
    3. explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.

*Provide copies of internal documents which support your claims in response to this question.*

1. Do you sell the goods to related entities in Australia? If yes, describe how prices are set for related party transactions and specify what proportion of your sales in terms of sales revenue are to related party entities. If available, provide copies of any internal documents relevant to establishing pricing to related parties.

# Section C Exported goods & like goods

## C-1 Wind towers exported to Australia

1. Provide a list of the goods exported to Australia for the last five years. Please detail, whether the wind towers are part of a project, the project name, the number of wind towers, the number of sections, location, whether for onshore or offshore projects, customer name. Include specification details and any technical and illustrative material that may be helpful in identifying, or classifying, the goods exported to Australia.

## C-2 Models sold in the domestic market

1. Provide a general description of the wind towers sold on the domestic market for the last five years.
2. Provide an explanation of the differences where those goods sold domestically (i.e., the like goods – see explanation in glossary) are not identical to goods exported to Australia.

|  |  |  |  |
| --- | --- | --- | --- |
| **EXPORTED TYPE** | **DOMESTIC TYPE** | **IDENTICAL?** | **DIFFERENCES** |
| Product code of each  model of the goods  exported to Australia | Product code of  comparable model  sold on the domestic  market of the country  of export |  | Where the goods exported to  Australia are not identical to the  like goods, describe the  specification differences.  If it is impractical to detail  specification differences in this  table, refer to documents which  outline differences |
|  |  |  |  |

## C-3 Wind towers sold in the third country markets

1. Provide a general description of the wind towers sold to third county markets for the last five years.
2. Provide a list of the third country markets.
3. Are your sales processes to any third country (i.e. exports to countries other than Australia) different to the sales process described in B-2.1? If yes, provide details of the differences.

## C-4 Product attributes

1. **Product shifting** – Describe how easily your company can shift its sales of the goods between the Australian market and alternative third country markets. In your discussion, please describe any contracts, other sales arrangements, or other constraints (including any third-country trade barriers such as tariffs, quotas, or other non-tariff barriers) that would prevent or impede your company from shifting exports of the goods between Australia and alternative country markets within a 12-month period.
2. **Product range** – Is the product range, product mix, or marketing of the goods in your domestic market different from that for your exports to Australia or to third-country markets?
3. **Product changes** –Have there been any significant changes in the product range, product mix, or marketing of the goods in your domestic market, for export to Australia, or for export to third-country markets in the last five years, or do you anticipate any future changes?

## C-5 Price comparisons

1. Please compare market prices of the goods in your company’s domestic market, the Australian market, and third-country markets. Provide information as to time periods and regions for any price comparisons and note the sources for your market knowledge.

## C-6 Your company’s sales to each market

1. Complete the following table as it relates to the period 1 July 2021 to 31 December 2022:

|  |  |
| --- | --- |
| Total company sales revenue |  |
| Goods under consideration / like goods |  |
| - Domestic Sales |  |
| - Australian Sales |  |
| - Third Country Sales |  |

1. Are the goods exported subject to anti-dumping/countervailing duty/safeguard findings, remedies, or proceedings in any jurisdictions?

|  |  |  |
| --- | --- | --- |
| **No** | **Yes** | **If yes— List the products(s), countries affected, and the date of such findings/remedies/proceedings** |
|  |  |  |

# Section D Domestic MARKET

## D-1 Domestic sales process

1. Provide details (and diagrams if appropriate) of the domestic sales process of your company and any other related entities including:
   1. Marketing and advertising activities
   2. Price determination and/or negotiation process
   3. Order placement process
   4. Order fulfilment process and lead time
   5. Delivery terms and process
   6. Invoicing process
   7. Payment terms and process

## D-2 Prevailing conditions of competition in the domestic market

1. Describe the domestic market for the goods and the prevailing conditions of competition within the market, including:
   1. Provide an overall description of the domestic market which explains its main characteristics and trends over the past five years;
   2. Provide the sources of demand for the goods in the domestic market, including the categories of customers, users or consumers of the product;
   3. Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b);
   4. Describe the factors that influence consumption/demand variability in the domestic market, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production;
   5. Provide details of any government regulations that affect consumption/supply/demand in the domestic market
   6. Describe any market segmentations in the domestic market; such as geographic or product segmentations;
   7. Provide an estimated proportion of sales revenue from each of the market segments listed in (f);
   8. Describe the way in which domestically produced goods and imported goods compete in the domestic market;
   9. Describe the ways that the goods are marketed and distributed in the domestic market; and
   10. Describe any other factors that are relevant to characteristics or influences on the domestic market for the goods.

*Provide documentary evidence to support the responses made to questions 1(a) to (j).*

1. Describe the key product attributes that influence purchasing decisions or purchaser preferences in the domestic market. Rank these preferences or purchasing influencers in order of importance.
2. Have there been any changes in market or consumer preferences in the domestic market for the goods in the last five years? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response.

## D-3 Relationship between price and cost in the domestic market

1. Describe the importance of the domestic market to your company’s operations. In your response describe:
   1. The proportion of your company’s sales revenue derived from sales of the goods in the domestic market; and
   2. The proportion of your company’s profit derived from sales of the goods in the domestic market.

*In responding to question 1 please provide evidence supporting calculations.*

1. Describe the nature of your product pricing (e.g., market penetration, inventory clearance, product positioning, price taker, price maker, etc.) and your price strategies (e.g., competition-based pricing, cost-plus pricing, dynamic pricing, price skimming, value pricing, penetration pricing, bundle pricing, etc.) in the domestic market. If there are multiple strategies applied, please rank these by importance. If there are different strategies for different products, please specify these. Provide copies of internal documents which support the nature of your product pricing.
2. Explain the process for how the selling prices of the goods for the domestic market by your business are determined. Provide copies of internal documents which support how pricing is determined.
3. How frequently are your domestic selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review. Provide the names and positions of all persons involved.
4. Rank the following factors in terms of their influence on your pricing decisions in the domestic market, with the most important factor ranked first and the least important factor ranked last:

* Competitors’ prices
* Purchase price of raw materials
* Cost to make and sell the goods
* Level of inventory
* Value of the order
* Volume of the order
* Value of forward orders
* Volume of forward orders
* Customer relationship management
* Supplier relationship management
* Desired profit
* Other [please define what this factor is in your response]

1. Describe the relationship between selling price and costs to make and sell in the domestic market. Does your company maintain a desired profit margin for the goods?
2. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the domestic market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.
3. Do you offer bundled pricing in the domestic market? If yes, explain how the pricing for bundled sales is determined. Explain how the costs to make and sell are considered in establishing these bundled prices for the goods. Provide copies of internal documents which support your claims in response to this question.
4. Does the volume of sales to a customer or the size of an order influence your selling price in the domestic market? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume-based prices for the goods. Provide copies of internal documents which support your claims in response to this question.
5. Does your organisation/business entity use sales contracts in the domestic market? If yes:
6. What proportion of your sales revenue would come from contracted sales versus uncontracted sales?
7. Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?
8. How frequently are sales contracts renegotiated?
9. How frequently are price reviews conducted between contracts?
10. Do you provide opportunities for price reviews for customers within contracts? If yes, provide a description of the process and an explanation of the circumstances that might lead to a price review.
11. Do changes in your costs to make and sell enable you to review prices for customers within contracts?
12. Provide a list of the customers under contract for the period 1 July 2021 to   
    31 December 2022 and copies of the two largest contracts in terms of sales revenue. Provide a complete translation of the documents.
13. Provide copies of any price lists for the goods used in the domestic market for the period   
    1 July 2021 to 31 December 2022. If you do not use price lists, describe the transparency of your prices in the domestic market.
14. How do you differentiate pricing for different products/models of the goods in the domestic market? Describe how your products are grouped for price differentiation and the methodology used. Describe any cost to make or selling cost differences between differentiated products. Describe how these cost differences (if any) influence pricing decisions. Provide copies of internal documents which support your claims in response to this question.
15. Do you tier or segment your domestic customers for the goods in terms of pricing? If yes, provide:
    1. a general description of how this is done;
    2. list the factors that influence pricing differentiation in different tiers or segments; and
    3. explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.

*Provide copies of internal documents which support your claims in response to this question.*

1. Do you sell the goods to related entities in the domestic market? If yes, describe how prices are set for related party transactions and specify what proportion of your sales in terms of sales revenue are to related party entities. If available, provide a copy of any internal document relevant to establishing pricing to related parties.

# Section E production

## E-1 Production process

1. Describe the production process for the goods and provide a flowchart of the process. Include details of all products manufactured using the same production facilities as those used for the goods. Also specify all scrap or by-products that result from producing the goods.
2. Are any of your suppliers related to your company (regardless of whether it is relevant to the manufacture of the goods)? If yes, please provide details including the product or services supplied by the related company.

## E-2 Production of the goods under consideration

1. Describe how your company determines its volume of production for the goods, product mix of production and the factors that contribute to these decisions. How frequently are production volumes determined for the goods? How frequently is the product mix determined for the goods?
2. What lead times are typically needed to adjust volumes of production for the goods?

## E-3 Changes in operations

1. Please indicate whether your company has experienced any of the following changes in relation to the production of the goods in the last five years.

|  |  |  |
| --- | --- | --- |
| *Tick as many as appropriate.* | | *If ticked, please describe the nature, timing / duration, and*  *impact on operations of any such reported changes as well as the*  *business reasons for them; leave completely blank if not applicable* |
|  | Plant openings |  |
|  | Plant closings |  |
|  | Prolonged shutdowns |  |
|  | Production curtailments |  |
|  | Relocations |  |
|  | Expansions |  |
|  | Acquisitions |  |
|  | Consolidations |  |
|  | Weather-related or force majeure events |  |
|  | Other (e.g., revised labour agreements, technology) |  |

1. Does your company anticipate any changes in the character of its operations in relation to the production of the goods in the future?

|  |  |  |
| --- | --- | --- |
| **No** | **Yes** | **If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions.** |
|  |  |  |

## E-4 Capacity Utilisation

1. Provide information about your company's total production in the following table:

|  |  |
| --- | --- |
|  | Period 1 July 2021 to 31 December 2022 |
| A – Production capacity (e.g. number of wind towers and sections thereof)\* |  |
| B – Actual production in volume (e.g. number of wind towers and sections thereof) |  |
| C – Capacity utilisation (%)  (B/A x 100) |  |

\* rather than showing a ‘name-plate’ optimal capacity it is more meaningful to show the maximum level of production that may reasonably be attained under normal operating conditions. For example, assuming normal levels of maintenance and repair, a number of shifts and hours of operation that is not abnormally high, and a typical production mix.

1. Explain how the production capacity and capacity utilisation has been calculated.
2. Do you have warehousing facilities for the goods? If no, what do you do with excess inventory? If yes:
   1. What is the capacity of these facilities?
   2. What was the monthly amount of inventory maintained for the period 1 July 2021 to   
      31 December 2022?
   3. What is the average period of time that inventory is retained (describe how this is calculated)?
3. Have there been any changes to the type of capital or technology utilised by your company in the manufacturing of the goods in the last five years? If yes, provide details.
4. For each plant capable of producing inputs that could be utilised to make the goods, provide the date that production facility came into operation and the production capacity of the plant over the past five years. The production capacity should be based on an actual production capacity, not a budgeted production capacity.
5. List any significant investments in the past five years to either upgrade, refurbish or build any of the plants used in the production of the goods.
6. Please describe the constraint(s) that set the limit(s) on your company’s practical overall capacity over the last five years. If different constraints were binding over different periods reported, please specify when each constraint was limiting your reported practical overall capacity. If a constraint was not actually binding over the period reported but was still a constraint to achieving the installed capacity level, indicate at what level it would have been binding.

|  |  |  |
| --- | --- | --- |
| **Constraint**  (*tick as many as appropriate*) | | **Description**  (*If ticked, please describe the details, timing, and duration*  *of the constraint; leave completely blank if not applicable)* |
|  | Production bottlenecks |  |
|  | Existing labour force |  |
|  | Supply of material inputs |  |
|  | Fuel or energy |  |
|  | Storage capacity |  |
|  | Logistics/transportation |  |
|  | Other constraints (list the specific constraints in the description field) |  |

# Section F SUPPLY AND DEMAND FACTORS

## F-1 Changes in factors affecting supply

1. Have changes in any factors affecting supply (e.g., changes in availability or prices of energy or labour; transportation conditions; capacity and/or methods of production; technology; export markets; or alternative production opportunities) affected the availability of the goods for production and export to the Australian market, other export markets, or the domestic market, since 1 July 2021? If yes, please describe.
2. Has the COVID-19 pandemic or have any government actions taken to contain the spread of the COVID-19 virus resulted in changes in your company’s supply chain arrangements, production, and shipments (including exports to Australia)? In your response, please discuss the duration and timing of any such changes as they relate to your operations.
3. Do you anticipate any factors that may affect supply to the Australian market, other export markets or the domestic market over the next year?
4. Describe any changes to, and the effects of, increased cost associated with exporting the goods to Australia (e.g., shipping and other post-exportation expenses) and the consequential effects on supply and demand for wind towers.
5. Do you anticipate any factors that may affect supply to the Australian market, other export markets or the domestic market over the next 5 years?

## F-2 Changes in factors affecting demand

1. Indicate how demand in the following markets for the goods has changed in the last five years and how you anticipate demand will change in the future. Explain any trends and describe the principal factors that have affected, and that you anticipate will affect, these changes in demand.

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Market** | **Overall increase** | **Fluctuate up** | **No change** | **Fluctuate down** | **Overall decrease** | **Explanation and factors** |
| **Demand since 1 January 2019** | | | | | | |
| Domestic market |  |  |  |  |  |  |
| Australia |  |  |  |  |  |  |
| Other markets |  |  |  |  |  |  |
| **Anticipated future demand** | | | | | | |
| Domestic market |  |  |  |  |  |  |
| Australia |  |  |  |  |  |  |
| Other markets |  |  |  |  |  |  |

## F-3 COVID-19 pandemic

1. What impacts have COVID-19 had on your business operations specifically, and the wind tower industry in general?

## F-4 Anti-dumping and countervailing measures

1. Describe the significance of the existing antidumping/countervailing measures on your company’s capacity, production, domestic market shipments, exports to Australia and other markets, and inventories. You may wish to compare your company’s operations before and after the imposition of the measures.
2. Would you anticipate any changes in the character of your operations or organisation, including capacity, production, exports to Australia, inventories, purchases, employment, revenues, costs, profits, cash flow, capital expenditures, research and development expenditures, or asset values relating to the production of the goods in the future if the countervailing duty/antidumping duty measures were to be revoked?

If yes please supply details as to the time, nature, significance of such changes and provide underlying assumptions along with relevant portions of business plans or other supporting documentation that addresses this issue. Include in your response a specific projection of your capacity to produce the goods for the Australian market in the next 1 to 5 years.

# Exporter's declaration

I hereby declare that.............................................................(company)

have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this submission is complete and correct to the best of my knowledge and belief.

**Name :.............................................................................**

**Signature :.............................................................................**

Position in

**Company :.............................................................................**

**Date :.............................................................................**

# Appendix Glossary of terms

This glossary is intended to provide you with a basic understanding of technical terms that appear in the questionnaire.

**Cost of production/manufacturing**

The cost of production or manufacture consists of all manufacturing costs associated with the goods. It is the sum of direct materials, direct labour and factory overheads.

**Cost to make and sell**

The cost to make and sell is the sum of the cost of production or manufacture, and the selling, general and administration costs associated with the sale of those goods.

**Direct labour cost**

Direct labour is categorised as a variable cost, i.e. the value varies with the level of production.

**Exporting country**

The country of export is normally the country of origin from which the goods are shipped. The country of export may be an intermediate country, except where the products are merely transhipped through that country, or the products concerned are not produced in that country, and there is no comparable price in that country.

**Factory overheads**

Factory overheads consist of variable costs e.g. power, supplies, indirect labour and fixed costs e.g. factory rent, factory insurance, factory depreciation etc.

**Goods under consideration (the goods)**

The goods to which the application for anti-dumping action relates. That is, the goods that you have exported to Australia allegedly at dumped prices.

**Like goods**

Like goods are goods sold on the domestic market of the country of export (or to a third country) that are identical in all respects to the goods or that, although not alike in all respects have characteristics closely resembling those of the goods. The term ‘like goods’ also refers to the goods produced by the Australian industry allegedly being injured by dumped imports.

**Selling, general and administration expenses (SG&A)**

The selling, general and administration expenses includes all selling, distribution, general and administration expenses including finance costs that would be incurred if the goods were sold for domestic consumption in the country of export. The amounts are determined in each case using all the available information and may include expenses incurred in:

. domestic sales of like goods;

. sale of goods of the same general category by the exporter; or

. sales in the industry in the country of export.

The expenses must, however, reflect the selling, general and administration costs of the goods. Administrative and selling expenses include: director’s fees, management salaries and benefits, office salaries and benefits, office supplies, insurance, promotion, entertainment, depreciation and corporate overheads.

1. Principal shareholders are those who are able to cast, or control the casting of, 5% or more of the maximum amount of votes that could be cast at a general meeting of your company. [↑](#footnote-ref-2)