IMPORTER QUESTIONNAIRE

Steel Reinforcing Bar

Exported to Australia from the People’s Republic of China

This questionnaire seeks information in relation to your imports and sales of steel reinforcing bar (the goods) exported to Australia from the People’s Republic of China (China).

This information will be used to assist in determining export prices and non-injurious prices, to construct the Australian market for the goods, and in the assessment of the applicant’s injury claims.

Australian Dumping Notice No. 2020/081 provides details of the goods under consideration, the application and the investigation procedures.

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| --- | --- | --- |
| **Part A** | **Company and overseas supplier information** | **Return as quickly as possible but no later than**  **27 July 2020** |
| **Part B** | **Imports and forward orders** | **Return as soon as possible after receiving the Commission’s detailed spreadsheets but no later than 5 Aug 2020** |
| **Part C** | **Sales and expenses** |
| **Part D** | **Australian market** |

The timeliness of your response is important. The Commissioner must consider the direction from the Minister for Industry, Innovation and Science as set out in the *Customs (Extensions of Time and Non-cooperation) Direction 2015* (the Direction). More details on this direction are explained in Anti-Dumping Notice 2015/129, available on the Commission’s website at [www.adcommission.gov.au](http://www.adcommission.gov.au).

**Return E-mail**: [investigations2@adcommission.gov.au](mailto:investigations2@adcommission.gov.au)

Part A – Company and overseas supplier information

**A.1 Your company**

|  |  |
| --- | --- |
| Company Name |  |
| ABN: |  |
| Contact name: |  |
| Position: |  |
| Mailing address: |  |
|  |  |
|  |  |
|  |  |
|  |  |
| Telephone: |  |
| Facsimile: |  |
| E-mail address: |  |

Provide details on the ownership of your company and major shareholders:

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Describe the role of your company in the Australian market for the goods – for example, buying or selling agent, importer/distributor, importer/wholesaler, importer/retailer or importer/end-user.

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At what level of trade is each of your customers – for example, distributor, wholesaler, retailer or end-user?

|  |  |
| --- | --- |
| **Customer** | **Level of trade** |
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**A.2 Your overseas supplier(s) of the goods under consideration**

Please complete the below information for each of your overseas suppliers of the goods (using a new form for each supplier).

**Supplier 1**

|  |  |
| --- | --- |
| Commodity: | Steel Reinforcing Bar |
| Supplier name: |  |
| Is the supplier the manufacturer?  If ‘no’, please also answer question A.3 in relation to this supplier. |  |
| Finish(es) supplied: |  |
| Country of origin: |  |
| Contact name: |  |
| Position: |  |
| Mailing address: |  |
|  |
|  |
|  |
|  |
| Telephone: |  |
| Facsimile: |  |
| E-mail address: |  |

**Supplier 2**

|  |  |
| --- | --- |
| Commodity: | Steel Reinforcing Bar |
| Supplier name: |  |
| Is the supplier the manufacturer?  If ‘no’, please also answer question A.3 in relation to this supplier. |  |
| Finish(es) supplied: |  |
| Country of origin: |  |
| Contact name: |  |
| Position: |  |
| Mailing address: |  |
|  |
|  |
|  |
|  |
| Telephone: |  |
| Facsimile: |  |
| E-mail address: |  |

**A.3 Overseas manufacturer(s) of the goods under investigation**

If the supplier(s) listed in your response to question A.2 above is not the manufacturer of the goods supplied, please complete the below for each manufacturer of the goods supplied (using a new box for each supplier).

|  |  |
| --- | --- |
| Commodity: | Steel Reinforcing Bar |
| Supplier name (from A.2): |  |
| Manufacturer name: |  |
| Country of origin: |  |
| Manufacturer contact name: |  |
| Position: |  |
| Mailing address: |  |
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|  |
| Telephone: |  |
| Facsimile: |  |
| E-mail address: |  |

**A.4 Timing of proposed visit by the Commission**

The Commission will ensure that data submitted by you is complete, relevant and accurate and that such data can be used by the Commission in the making of its findings. The Commission would like to verify the data submitted by you and discuss the review following submission in August 2020.

Please advise dates suitable to your company for this verification?

Please note that it may be helpful to consider the availability of key staff, such as your accountant, purchasing officer or sales staff.

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Address for proposed visit (the address at which your accounting records are held):

|  |  |
| --- | --- |
| Street address: |  |
|  |
|  |
|  |
|  |
| Telephone: |  |
| Facsimile: |  |

In the event a physical visit is not possible the Commission will arrange for a remote verification to take place. Part B – Imports and forward orders

Please complete this part after the Commission has provided you with your detailed spreadsheets of imports, and return this part, along with your response to Part C no later than 5 Aug 2020.

To assist with the identification of imports of the goods under investigation, the Commission will shortly provide you with spreadsheets of your imports of steel reinforcing bar from 1 July 2019 to 30 June 2020.

This information will be provided from the Commission’s import database.

Within this spreadsheet, the Commission will select several shipments (by highlighting them) that it wishes to examine in more detail.

**B.1 Import details**

Please complete the “Part B – Cost to import and sell” spreadsheet included in the “Importer Questionnaire Spreadsheets” workbook, with details for the highlighted selected shipments.

The spreadsheet should contain costs and sales data for the selected shipments of steel reinforcing bar **exported** from China from 1 July 2019. The completed spreadsheet should be returned as part of your Part B response, along with details of your forward orders (see B.3 below).

(Please note that you cannot complete this part of the questionnaire until the Commission provides you with the respective listing of your imports. The Commission will contact you shortly in this regard after receiving Part A of the questionnaire).

**B.2 Documents required at the visit**

In relation to the shipments selected by the Commission for verification (i.e. those shipments highlighted in the spreadsheet which will be provided by the Commission), please prepare copies of the commercial invoice, bill of lading, packing list and any other documents supporting post exportation costs including;

* overseas freight and insurance;
* customs duties;
* landing and wharfage charges;
* freight forwarding fees;
* cartage/delivery fees and
* any other charges between the FOB point and the landed, duty paid into-store point.

It would be appreciated if these documents could be assembled into one bundle for each shipment selected. Please retain these copies for presentation at the Commission’s visit.

**B.3 Forward orders**

Please complete the “Part B – Forward Orders” spreadsheet within the “Importer Questionnaire Spreadsheets” workbook. The completed spreadsheet should be returned as part of the Part B response, along with details of your selected shipments as discussed in B.1 above.

Part C – Sales and selling expenses

Please return your responses to Part C along with your response to Part B no later than 5 Aug 2020.

**C.1 Your sales**

Please provide details of all your sales in the Australian market of steel reinforcing bar exported from China from 1 July 2019 to 30 June 2020 using the “Part C – Sales” spreadsheet. If you have used formulas to complete this spreadsheet, please retain the formulas.

**Model Control Code**

The sales spreadsheet requires the identification of the type of model sold to your customer using the model control code (MCC) structure detailed in the table below. At a minimum, the categories listed as mandatory must be reported in the sales spreadsheet.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Item** | **Category** | **Sub-category** | **Identifier** | **Sales Data** | **Cost Data** |
| 1 | Prime | Prime | P | Mandatory | N/A |
| Non-Prime | N |
| 2 | Minimum yield strength specified by product standard (Mega Pascals or “MPa”) | Less than or equal to 300 | A | Mandatory | Mandatory |
| Greater than 300 but less than or equal to 480 | B |
| Greater than 480 but less than 550 | C |
| Equal to or greater than 550 | D |
| 3 | Finished form | Rebar in length/straight | S | Mandatory | Mandatory |
| Rebar in coil | C |
| 4 | Nominal diameter (millimetres or “mm”) | Less than 12 | A | Mandatory | Optional |
| Greater than or equal to 12 and less than or equal to 16 | B |
| Greater than 16 and less than or equal to 32 | C |
| Greater than 32 and less than or equal to 50 | D |
| 5 | Length (metres or “m”) | Less than or equal to 6 | 1 | Mandatory | Optional |
| Greater than 6 and less than or equal to 12 | 2 |
| Greater than 12 | 3 |
| Coil product | C |
| 6 | Deformation pattern along Length | Threaded | T | Mandatory | Optional |
| Non-Threaded | N |

In constructing a MCC, use a "-" between each category. For example: P-B-S-B-3-N

**C.2 Selling, general and administration expenses**

Please calculate your Selling, General and Administration (SG&A) costs for the goods for the period

**1 July 2019** to **30 June 2020** and enter this information into the “**Part B – Cost to import and sell”** spreadsheet included in the “Importer Questionnaire Spreadsheets” workbook.

These expenses are normally derived from profit and loss statements or other management records and are typically expressed as a percentage of sales revenue. Where steel reinforcing bar is only a part of overall company sales, allocations of SG&A expenses may have to be made. Please provide a clear explanation to support your allocation methodology.

The Commission will seek to verify your sales data, and your estimate of SG&A expenses during the verification process.

**Part D – Australian market**

## D.1 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. Describe any market segmentations in Australia; such as geographic or product segmentations;
   6. Provide an estimated proportion of sales revenue from each of the market segments listed in (e);
   7. Describe the way in which Australian manufactured, Chinese and other imported goods compete in the Australian market;
   8. Describe the ways that the goods are marketed and distributed in the Australian market; and
   9. 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 (i).*

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 commercially significant market participants in the Australian market for the goods at each level of trade over the investigation period. Include in your description:

* names of the participants;
* the level of trade for each market participant (e.g., manufacturer, reseller, original equipment manufacturer (EOM), retailer, corporate stationer, importer, etc.);
* a description of the degree of integration (either vertical or horizontal) for each market participant; and
* an estimation of the market share of each participant.

1. Identify the names of commercially significant importers in the Australian market for the goods over the investigation period and estimate their market share. Specify the country each importer imports from and their level of trade in the Australian market, if known.
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).

*In responding to question 6 ensure that relevant regulations are referenced.*

## D.2 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 end uses of the goods in the Australian market from all sources.
2. 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.
3. Identify if there are any commercially significant market substitutes in the Australian market for the goods.
4. Identify if there are any commercially significant market complements in the Australian market for the goods.
5. 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.

## D.3 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 to support the calculations.*

1. Is your organisation/business entity the price leader for the goods in the Australian market? If no, please explain the reasons behind your response and specify the name(s) of the price leaders.
2. 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.
3. 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.
4. 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.
5. 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:
6. Competitors’ prices
7. Purchase price of raw materials
8. Cost to make and sell the goods
9. Level of inventory
10. Value of the order
11. Volume of the order
12. Value of forward orders
13. Volume of forward orders
14. Customer relationship management
15. Supplier relationship management
16. Desired profit
17. Brand attributes
18. Other [please define what this factor is in your response]
19. 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.
20. 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.
21. 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.
22. 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.
23. Does your organisation/business entity use sales contracts in the Australian market? If yes:
24. What proportion of your sales revenue would come from contracted sales versus uncontracted sales?
25. Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?
26. How frequently are sales contracts renegotiated?
27. How frequently are price reviews conducted between contracts?
28. 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.
29. Do changes in your costs to make and sell enable you to review prices for customers within contracts?
30. Provide a list of the customers under contract during the investigation period and copies of the two largest contracts in terms of sales revenue.
31. Provide copies of any price lists for the goods used in the Australian market during the investigation period. If you do not use price lists, describe the transparency of your prices in the Australian market.
32. 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 method 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.
33. 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.

## D.4 Marketing and sales support in the Australian market

1. How does your company market the goods in the Australian market? Include in your response the value proposition used (e.g., competitive price, superior quality, reliability, availability, etc.).
2. Does your company conduct brand segmentation in the Australian market for the goods? If yes, describe the brand segmentation used and provide the proportion of sales revenue derived from each brand segment.
3. Provide examples of your Australian advertising of the goods over the past five years. If you have not used advertising in Australia, provide examples of any other promotion campaigns you have conducted over the investigation period.
4. How many people are in your Australian sales team and where are they located? In general terms, how are they remunerated? If they are offered performance pay based on sales, describe the performance indicators used to establish the performance pay. Provide copies of internal documents which support your claims in response to this question.
5. Describe what parameters are provided to sales staff to assist in establishing pricing for the goods when negotiating sales with customers. Provide copies of internal documents which support your claims in response to this question.

**Checklist**

* Return by **27 July 2020**
* Part A response
  + Your company details
  + Supplier/manufacturer details
  + Suitable dates for verification meeting with the Commission
* Return by **5 August 2020**
* Part B response
* Sales Route spreadsheet of imports
  + Information on forward orders
* Part C response
  + Sales spreadsheet of sales
  + Selling, General and Administration expenses
* Part D response
* During verification meeting (may be required to assist verification)
  + Copies of source documents of post-exportation costs for shipments
  + Financial statements
  + Bank records
  + Import and post-exportation documents for other shipments
  + Sales invoices
  + Documentation to support selling costs (eg freight, warehousing)
  + Documentation to support SG&A expenses