



Australian Government  
Department of Industry,  
Innovation and Science

Anti-Dumping  
Commission

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## Consideration report number: 401

Application for a dumping duty notice

Submitted by: Bekaert Wire Ropes Pty Ltd

In relation to certain wire rope exported to Australia from  
the Republic of South Africa

April 2017

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## Abbreviations

Abbreviation	Full reference
ABF	Australian Border Force
ABS	Australian Bureau of Statistics
ADN	Anti-Dumping Notice
AUD	Australian dollars
BBRG Australia or the applicant	Bekaert Wire Ropes Pty Ltd
the Commission	Anti-Dumping Commission
the Commissioner	Commissioner of the Anti-Dumping Commission
CPI	consumer price index
the Act	the <i>Customs Act 1901</i>
CTMS	cost to make and sell
EXW	ex-works
FOB	free on board
FIS	free into store
the goods	'wire rope' (as described at section 2.3) or 'the goods the subject of the application'
Haggie	Haggie Reid Pty Ltd
injury analysis period	from 1 January 2013
investigation period	1 January 2016 to 31 December 2016
IWRC	Independent Wire Rope Cores
mm	millimetres
Material Injury Direction	<i>Ministerial Direction on Material Injury 2012</i>
NIP	non-injurious price
OCOT	ordinary course of trade
the Parliamentary Secretary	the Assistant Minister for Industry, Innovation and Science and Parliamentary Secretary to the Minister for Industry, Innovation and Science
SG&A	selling, general and administrative expenses
South Africa	Republic of South Africa
USP	unsuppressed selling price

# 1. Findings and recommendations

This report provides the result of the consideration by the Anti-Dumping Commission (the Commission) of an application lodged under subsection 269TB(1) of the *Customs Act 1901* (the Act)<sup>1</sup> by Bekaert Wire Ropes Pty Ltd ('BBRG Australia', or 'the applicant') for the publication of a dumping duty notice in respect of certain wire rope ('wire rope' or 'the goods') exported to Australia from the Republic of South Africa (South Africa).

BBRG Australia alleges that the Australian industry for wire rope has suffered material injury caused by wire rope exported to Australia from South Africa at dumped prices.

The legislative framework that underpins the making of an application and the Commission's consideration of an application is contained in Divisions 1 and 2 of Part XVB.

## 1.1. Findings

In accordance with subsection 269TC(1), the Commission has examined the application and is satisfied that:

- the application complies with the requirements of subsection 269TB(4) (as set out in section 2.2 of this report);
- there is an Australian industry in respect of like goods (as set out in section 2.4 of this report); and
- there appear to be reasonable grounds for the publication of a dumping duty notice in respect of the goods (as set out in sections 3, 4 and 5 of this report).

## 1.2. Recommendations

Based on the above findings, the Commission recommends that the Commissioner of the Anti-Dumping Commission (the Commissioner) decide not to reject the application and initiate an investigation to determine whether a dumping duty notice should be published.

The Commission further recommends that:

- exports to Australia during the investigation period<sup>2</sup> 1 January 2016 to 31 December 2016 be examined to determine whether dumping and material injury has occurred, and<sup>3</sup>
- details of the Australian market from 1 January 2013 be examined for injury analysis purposes.<sup>4</sup>

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<sup>1</sup> All legislative references in this report are to the *Customs Act 1901* unless otherwise specified.

<sup>2</sup> As defined in subsection 269T(1).

<sup>3</sup> In its application, BBRG Australia suggested a two year investigation period due to the long lead time from quotation to instalment of the goods. After due consideration, the Commission did not find a compelling reason to divert from its usual practice of setting a one year investigation period as outlined in the *Dumping and Subsidy Manual*.

<sup>4</sup> The purpose of the injury analysis period is to allow the Commission to identify and examine trends in the Australian market which in turn assists the Commission in its examination of whether material injury has occurred over the investigation period.

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If the Commissioner agrees with these recommendations, he must give public notice of the decision (**Non-Confidential Attachment 1**) in accordance with the requirements set out in subsection 269TC(4).

## **2. The application and the Australian industry**

### **2.1. Lodgement of the application**

#### **2.1.1. Legislative framework**

The procedures for lodging an application are set out in section 269TB.

The procedures and timeframes for the Commissioner's consideration of the application are set out in section 269TC.

#### **2.1.2. Application timeframe**

Table 1 below summarises the timeframes in relation to this application.

<b>Event</b>	<b>Date</b>	<b>Details</b>
Application lodged and receipted by the Commissioner under subsections 269TB(1) and (5)	10 March 2017	The Commission received an application from BBRG Australia alleging that the Australian industry has suffered material injury caused by wire rope exported to Australia from South Africa at dumped prices.
	24 March 2017	The Commission notified BBRG Australia that the application contained critical and important deficiencies which if left unaddressed, create doubt as to the reasonableness of the grounds for publication of a dumping duty notice.
Applicant provided further information in support of the application under subsection 269TC(2A)	30 March 2017	Further information and data was provided by BBRG Australia in support of the application and without having been requested to do so, as provided for in subsection 269TC(2A). The application is taken to include that further information and data, which meant that the application is taken to have been lodged and receipted on 30 March 2017, when the additional information was lodged and received. Accordingly, the 20 day period for consideration of the application was restarted.
Consideration decision due under subsection 269TC(1)	19 April 2017	The Commissioner shall decide whether to reject the application within 20 days after the applicant provided further information.

**Table 1: Application timeframe**

### **2.2. Compliance with subsection 269TB(4)**

#### **2.2.1. Finding**

Based on information submitted by the applicant, the Commission considers that the application complies with subsection 269TB(4).

#### **2.2.2. Legislative framework**

Subsection 269TC(1) requires that the Commissioner reject an application for a dumping duty notice if, among other things, the Commissioner is not satisfied that the application complies with subsection 269TB(4).

**2.2.3. The Commission’s assessment**

Table 2 below summarises the Commission’s assessment of the application’s compliance with subsection 269TB(4).

Requirement for the application	Details
Lodged in writing under subsection 269TB(4)(a)	The applicant lodged in writing confidential and non-confidential versions of the application. The non-confidential version of the application can be found on the electronic public record on the Commission’s website at <a href="http://www.adcommission.gov.au">www.adcommission.gov.au</a> .
Lodged in an approved form under subsection 269TB(4)(b)	The application is in the approved form (Form B108) for the purpose of making an application under subsection 269TB(1).
Contains such information as the form requires under subsection 269TB(4)(c)	The applicant provided: <ul style="list-style-type: none"> <li>• a completed declaration;</li> <li>• answers to all questions and completed versions of all appendices that were required by the applicant; and</li> <li>• sufficient detail in the non-confidential version of the application to enable a reasonable understanding of the substance of the information submitted in confidence.</li> </ul>
Signed in the manner indicated in the form under subsection 269TB(4)(d)	The application was signed in the manner indicated in Form B108 by a representative of the applicant.
Supported by a sufficient part of the Australian industry under subsection 269TB(4)(e) and determined in accordance with subsection 269TB(6)	As set out in section 2.4, the Commission is satisfied that there is an Australian industry, BBRG Australia, producing like goods. No other producers or manufacturers of wire rope in Australia were identified by the Commission. The Commission is satisfied that the level of support for the application complies with the requirements of subsections 269TB(6)(a) and (b).
Lodged in the manner approved under section 269SMS for the purposes subsection 269TB(4)(f)	The application was lodged in a manner approved in the Commissioner’s instrument made under section 269SMS, being by email to the Commission’s nominated email address in that instrument, which is: <a href="mailto:clientsupport@adcommission.gov.au">clientsupport@adcommission.gov.au</a> . The application was therefore lodged in a manner approved under subsection 269SMS(2).

**Table 2: Compliance with subsection 269TB(4)**

**2.3. The goods the subject of the application**

Table 3 below outlines the goods as described in the application and their corresponding tariff classification.

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<b>Full description of the goods, as subject of the application</b>				
<p>The goods the subject of this application are stranded wire rope, alloy or non-alloy steel, whether or not coated or impregnated, having both of the following:</p> <ul style="list-style-type: none"> <li>• Not greater than 8 strands;</li> <li>• Diameter not less than 58mm and not greater than 200mm,</li> </ul> <p>with or without attachments.</p>				
<b>Further information</b>				
<p>The stranded steel wire rope covered by this application can be further described as follows:</p> <ul style="list-style-type: none"> <li>(i) Stranded steel wire rope is rope and strand made of high carbon wire (whether or not containing alloys);</li> <li>(ii) The strand or rope can also be sheathed or impregnated and sheathed respectively in plastic or composites;</li> <li>(iii) The wires can be layered-up in various configurations in order to give the strand or rope the desired physical properties;</li> <li>(iv) Variances can include: <ul style="list-style-type: none"> <li>• strand diameter;</li> <li>• number of wires;</li> <li>• wire finish (e.g. typically black but may be galvanised);</li> <li>• wire tensile grade;</li> <li>• type of lubricant;</li> <li>• strand or rope length; and</li> <li>• whether or not an attachment is included (but not limited to ferrules and/or beackets).</li> </ul> </li> <li>(v) Cores may be made of: <ul style="list-style-type: none"> <li>• natural or synthetic fibre; or</li> <li>• Independent Wire Rope Cores (“IWRC”), which may or may not be sheathed or impregnated in plastic.</li> </ul> </li> </ul> <p>Typical uses include applications such as dragline hoist, drag and dump ropes, and shovel hoist, crowd and retract ropes.</p> <p>Goods excluded from this application are:</p> <ul style="list-style-type: none"> <li>• stranded wire rope that is stainless steel as defined under Note (e) “Stainless steel” to the Tariff;</li> <li>• stranded wire rope with more than 8 strands, regardless of diameter; and</li> <li>• stranded wire rope less than 58mm or greater than 200mm in diameter, regardless of the number of strands.</li> </ul>				
<b>Tariff classification (Schedule 3 of the Customs Tariff Act 1995)</b>				
Tariff code	Statistical code	Unit	Description	Duty rate
7312.10.00	91 and 92	Kilograms (kg)	Stranded wire, ropes, cables, plaited bands, slings and the like, of iron or steel, not electrically insulated: 91: ...Of a diameter exceeding 50 mm but not exceeding 100 mm 92: ...Of a diameter exceeding 100 mm	5%

**Table 3 – The goods as described in the application**

## **2.4. Like goods and the Australian industry**

### **2.4.1. Finding**

The Commission is satisfied that there is an Australian industry producing like goods to the goods the subject of the application, on the basis that:



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- BBRG Australia produces goods that have characteristics that closely resemble the goods the subject of the application, and
- at least one substantial process in the manufacture of like goods is carried out in Australia.

**2.4.2. Legislative framework**

Subsection 269TC(1) requires that the Commissioner reject an application for a dumping duty notice if, among other things, the Commissioner is not satisfied that there is, or is likely to be established, an Australian industry in respect of like goods.

Like goods are defined under subsection 269T(1). Subsections 269T(2), 269T(3), 269T(4), and 269T(4A) are used to determine whether the like goods are produced in Australia and whether there is an Australian industry.

**2.4.3. Locally produced like goods**

Table 4 below summarises the Commission’s assessment of whether the locally produced goods are identical to, or have characteristics that closely resemble, the goods the subject of the application and are therefore like goods.

Factor	The Applicant’s claims	The Commission’s assessment
Physical likeness	<p>The physical similarities between the locally produced wire rope and the imported goods include:</p> <ul style="list-style-type: none"> <li>• diameter;</li> <li>• breaking strength (which is determined by wire tensile strength – including size and grade of the rod wire is drawn from and work hardening), number of wires, number of strands and construction of rope);</li> <li>• length;</li> <li>• coating;</li> <li>• rope end termination; and</li> <li>• method of supply (steel or wooden reels).</li> </ul> <p>The locally produced wire rope is manufactured to the Australian Standard AS 3569-2010: Steel Wire Ropes</p>	<p>Based on information provided by the applicant including product brochures, the Commission is satisfied that the locally produced like goods are physically alike to the imported goods for the reasons specified by the applicant (including size, shape, content, weight, appearance, grade, strength etc.)</p> <p>In addition, the imported goods were declared under tariff classifications relevant to wire rope which describe goods with similar requirements of the Australian Standard AS 3569-2010 to which the locally produced like goods are made.</p>

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<b>Factor</b>	<b>The Applicant's claims</b>	<b>The Commission's assessment</b>
Commercial likeness	Wire rope manufactured by BBRG Australia competes directly with imported wire rope in the Australian market. The locally produced wire rope and the imported goods are offered competitively for sale to the Australian market, are interchangeable in end-use applications, and are supplied via similar supply channels and on similar commercial terms and conditions.	The Commission reviewed import pricing data from the Australian Border Force (ABF) import database in conjunction with the information within the application and is satisfied that price competition exists in the market between imported goods and the locally produced like goods, which suggests low product differentiation. The Commission is satisfied that the Australian industry manufactures like goods that are sold to the same or similar customers and therefore compete directly with imported goods.  In this context, the Commission is satisfied that there is a close commercial likeness between the imported goods and the locally produced goods.
Functional likeness	The locally produced wire rope and imported wire rope are used in the same end-uses within the mining industry.	Based on company websites and product brochures, the Commission considers that the imported goods and locally produced like goods perform the same functions and have the same or similar end uses within the mining industry.
Production likeness	Wire rope manufactured by BBRG Australia is produced in a similar manner to imported wire rope and via similar production processes, including from similar raw material carbon steel rod.	Based on company websites and product brochures, the Commission considers that locally produced like goods and the goods exported to Australia from South Africa: <ul style="list-style-type: none"> <li>• are manufactured in a similar manner; and</li> <li>• have the same or similar raw material inputs (e.g. high carbon wire).</li> </ul> The Commission therefore considers that there is a production likeness between the imported goods and the locally produced like goods.
<b>Commission's assessment</b>		
Based on the analysis above, the Commission considers that locally produced wire rope has characteristics that closely resembles the goods the subject of the application and therefore are like goods. The Commission will further examine the issue of like goods during the course of the investigation.		

**Table 4 – Like goods assessment**

**2.4.4. Manufacture in Australia**

Table 5 below summarises the Commission's assessment of whether at least one substantial process of manufacture is carried out in Australia and whether the like goods are therefore considered to have been manufactured in Australia as per

subsection 269T(2).

<b>The Applicant's claims</b>
<p>BBRG Australia estimates that the majority of the wire rope it manufactures is sourced from Australian raw materials. The wire used in wire rope is made in several materials and types, the most widely used material is high carbon steel of different diameters and tensile strengths. In the case of BBRG Australia, the significant proportion of the wire is supplied directly on spools from its local supplier which is loaded directly into the stranding machines. The remaining wires are delivered in a coil format or on a stem and are wound onto spools for further processing by BBRG Australia.</p> <p>The manufacture of wire rope by BBRG Australia involves two major transformation stages, which BBRG Australia described as:</p> <p><b>(i) Conversion of wire to strand:</b></p> <p>Strands are made up of two or more wires, laid in any one of many specific geometric patterns. Wires are twisted (wound) together in either a planetary or a tubular stranding machine. In the case of mining rope, each strand can have up to 62 wires of up to six different sizes and tensile strength making up one strand.</p> <p><b>(ii) Conversion of strand to rope:</b></p> <p>Six or eight strands (depending on construction) are then wound around either a fibre core or an IWRC in a processing known as "closing". The closing process depending on the product can be closed in a planetary or tubular closing machine to form what is known as a either 6 or 8 stranded rope.</p> <p>A diagram of BBRG Australia's manufacturing process is provided at A-3.6 of its application.</p>
<b>The Commission's assessment</b>
<p>The Commission is satisfied that at least one substantial process of manufacture is carried out in Australia by the applicant, based on:</p> <ul style="list-style-type: none"> <li>• the description of the manufacturing process outlined above;</li> <li>• the claim that of the majority of raw materials used by BBRG Australia are sourced in Australia; and</li> <li>• the fact that the conversion of raw materials to wire rope by BBRG Australia takes place at manufacturing facilities in Australia,</li> </ul>

**Table 5 – Manufacture of like goods in Australia**

## 2.5. Australian industry information

Table 6 below summarises the Commission's assessment of whether BBRG Australia has provided sufficient information in the application to analyse the performance of the Australian industry.

<b>Have the relevant appendices to the application been completed?</b>		
A1	Australian production	Yes
A2	Australian market	Yes
A3	Sales turnover	Yes
A4	Domestic sales	Yes
A5	Sales of other production	Yes
A6.1	Cost to make and sell ('CTMS' and profit) – Domestic sales	Yes
A6.2	CTMS (and profit) – Export sales	Yes

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A7	Other injury factors	Yes
<b>General administration and accounting information – BBRG Australia</b>		
History	<p>A history of BBRG Australia’s operations was provided in the application. In summary:</p> <ul style="list-style-type: none"> <li>• BBRG Australia (formerly WRI Australia) is the trading name of Bekaert Wire Ropes Pty Ltd;</li> <li>• rope manufacturing commenced in Australia at Newcastle in 1925, as a result of an association between Broken Hill Propriety Co Ltd and rope manufactures in Great Britain;</li> <li>• in 2000, as part of a corporate restructure, the rope business was rebranded as OneSteel Wire Pty Ltd under OneSteel Limited;</li> <li>• the company name was rebranded as Moly-Cop Ropes following the change in name of OneSteel Limited to Arrium Limited; and</li> <li>• in March 2015, Arrium Limited sold the rope business to the Bekaert Group, a Belgian based wire and rope manufacturer.</li> </ul>	
Ownership	BBRG Australia is wholly-owned by Bekaert Wire Rope Industry NV, which is owned by NV Bekaert SA (67 per cent parent).	
Operations	<p>BBRG Australia provided internal organisational charts detailing the divisions within the company.</p> <p>BBRG Australia manufactures a range of rope products for the open cut mining sector, and has the capability to produce ropes for other sectors, such as construction.</p> <p>BBRG Australia currently employees 103 employees in New South Wales and Queensland.</p>	
Financial year	1 January to 31 December.	
Audited accounts	The 2015 audited accounts were provided with the application. BBRG advised that it would provide its 2016 audited accounts once finalised.	
<b>Production and sales information</b>	<b>Cost to make and sell information</b>	<b>Other injury factors</b>
Confidential Appendices A-2 and A-4 to the application contains the required data.	Confidential Appendix A-6 to the application contains the required data.	Confidential Appendix A-7 to the application contains the required data.
<b>The Commission’s assessment</b>		
Based on information in the application, the Commission is satisfied that there is sufficient data on which to analyse the performance of the Australian industry between 1 January 2013 and 31 December 2016.		

**Table 6 – Australian industry information**

## 2.6. Market size

As part of its application, BBRG Australia submitted its own production data and market intelligence of import volumes (which is based on detailed estimates of the volume requirements of various mine sites in Australia). BBRG Australia completed Confidential Appendix A-2 to the application, using the above data to estimate the size of the Australian market.

The Commission compared BBRG Australia’s estimates of import volumes to data sourced from the ABF import database which the Commission filtered based on the following methodology:

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- data was extracted from the ABF import database based on the relevant tariff classification and statistical codes (where applicable);
- the data was filtered based on the goods description to exclude imports that appeared not to be the goods; and
- the data was filtered to exclude imports where the free on board (FOB) price was outside a reasonable range (\$1,200 to \$4,000 AUD / tonne).

The Commission notes that eight statistical codes, including statistical codes 91 and 92 for tariff subheading 7312.10.00 which have been identified as most relevant to the goods at section 2.3, were added effective from 1 January 2015 as advised in Australian Customs and Border Protection Notice No. 2014/57.<sup>5</sup> Therefore, the Commission is able to filter the data from the ABF import database with a greater degree of certainty for the two most recently completed calendar years, 2015 and 2016.

However, for calendar years prior to 2015 and 2016, the data from the ABF import database was difficult to filter for countries other than South Africa due to the generality of the tariff subheading which contained only two statistical codes and some many thousands of imports whereby the goods description did not assist in identifying whether or not the imports were the goods. As a result, at this point, the Commission considers that its estimates of the import volumes for 2013 and 2014 for countries other than South Africa, based on data from the ABF import database, are unreliable.

The Commission notes that BBRG Australia's estimates of import volumes from South Africa were broadly similar to the Commission's estimates. Given that the overwhelming majority of imports appear to be from South Africa, for the purposes of this report, the Commission considers that the applicant's estimates for countries other than South Africa are reasonable and reliable for estimating the size of the Australian market for the injury analysis period. The Commission will endeavour to more accurately estimate the Australian market size for wire rope as part of the investigation.

An assessment of the Australian market size for wire rope is at **Confidential Appendix 1**.

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<sup>5</sup> <http://www.border.gov.au/Customsnotices/Documents/acnchangesfor1jan2015final.pdf>

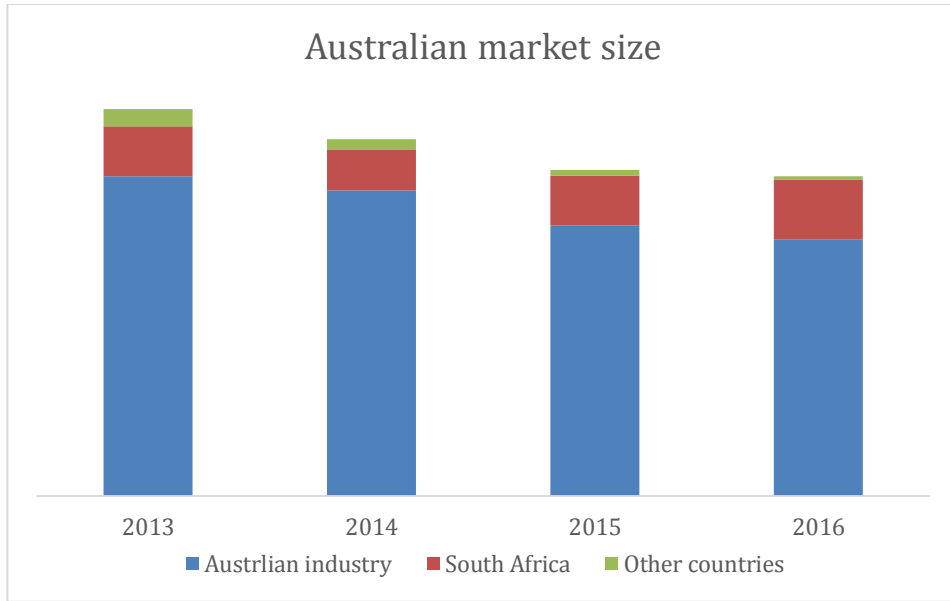


Figure 1 – Applicant’s estimates of the Australian market size for wire rope

## 3. Reasonable grounds – dumping

### 3.1. Findings

Having regard to the matters contained in the application and to other information considered relevant, pursuant to subsection 269TC(1)(c), the Commission considers that there appear to be reasonable grounds to support the claims that:

- the goods have been exported to Australia from South Africa at dumped prices;
- the estimated dumping margin for the goods exported to Australia from South Africa is greater than 2 per cent and therefore is not negligible, and
- the estimated volume of the goods exported to Australia from South Africa that appear to have been dumped is greater than 3 per cent of the total import volume of the goods and therefore is not negligible.

### 3.2. Legislative framework

Subsection 269TC(1) requires that the Commissioner reject an application for a dumping duty notice if, among other things, the Commissioner is not satisfied that there appear to be reasonable grounds for the publication of a dumping duty notice.

Under section 269TG, one of the matters that the Assistant Minister for Industry, Innovation and Science and Parliamentary Secretary to the Minister for Industry, Innovation and Science (Parliamentary Secretary)<sup>6</sup> must be satisfied of in order to publish a dumping duty notice is that the export price of goods that have been exported to Australia is less than the normal value of those goods, i.e. that dumping has taken place (to an extent that is not negligible). This issue is considered in the following sections.

### 3.3. Export price

#### 3.3.1. Legislative framework

Export price is determined by applying the requirements in section 269TAB, taking into account whether the purchase or sale of goods was an arms length transaction under section 269TAA.

#### 3.3.2. The Applicant's estimate of export price

In the absence of detailed import statistics from the Australian Bureau of Statistics (ABS) due to various confidentiality restrictions on commodity and country details, the applicant has relied upon deductive export price calculations under subsection 269TAB(1)(b) to estimate the export price of wire rope exported to Australia from South Africa.

Table 7 below summarises the approach taken by the applicant to estimate export prices and the evidence relied upon.

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<sup>6</sup> On 19 July 2016, the Prime Minister appointed the Parliamentary Secretary to the Minister for Industry, Innovation and Science as the Assistant Minister for Industry, Innovation and Science. For the purposes of this investigation the Minister is the Parliamentary Secretary to the Minister for Industry, Innovation and Science.

Country	Basis of estimate	Details
South Africa	Deductive export price at ex-works (EXW) shipping terms, calculated under subsection 269TAB(1)(b) observing the prescribed deductions under subsection 269TAB(2)	BBRG Australia has calculated deductive export prices for wire rope sold into the Australian market by relying on its market intelligence for market offers for the sale of the goods in Australia by Haggie Reid Pty Ltd ('Haggie' the importer of the goods from South Africa) during 2016 (and January 2017). From the market offers BBRG Australia deducted amounts for selling, general and administrative costs (SG&A) and warehousing costs of the importer (based on Haggie's 2015 financial statements), delivery expenses (based on its own costs), customs charges (based on a quote it received) and overseas freight.

**Table 7 – BBRG Australia's export price estimates**

### **3.3.3. The Commission's assessment of export price**

The Commission examined the data and supporting evidence provided by the applicant.

To verify the reliability of the applicant's export price estimate, the Commission compared the data in the application to data obtained from the ABF import database using the methodology outlined in section 2.6.

The Commission identified a significant variance between the applicant's export price estimate and the Commission's estimate of the weighted average FOB export price based on ABF import data. Given the materiality of the variance and noting that certain deductions applied in the applicant's deductive export price calculations are based on the applicant's own expenses which may not be relevant to imports from South Africa, the Commission considers that its FOB export price estimate is more reasonable and reliable for the purposes of this report. The Commission has therefore calculated the export price having regard to all relevant information in accordance with subsection 269TAB(3). The Commission's FOB export price estimate was higher than the applicant's estimate. The impact on dumping margin calculations is further outlined at section 3.5.

An assessment of export prices is at **Confidential Attachment 2**.

## **3.4. Normal value**

### **3.4.1. Legislative framework**

Normal value is determined by applying the requirements in section 269TAC taking into account whether:

- the purchase or sale of the goods was an arms length transaction under section 269TAA;
- the goods were sold in the ordinary course of trade (OCOT) under section 269TAAD;
- there has been an absence or low volume of sales of like goods in the country of export; and
- whether the situation in the market of the country of export is such that sales in that country are not suitable for determining normal value under subsection 269TAC(1).



**3.4.2. The Applicant's estimate of normal value**

In estimating a normal value for like goods in South Africa, BBRG Australia relied on its market intelligence which included evidence of an actual selling price of 95mm wire rope sold in the South African market. The applicant stated that 95mm is the most common diameter of wire rope used in mining in the South African market whereas 83mm is the most common diameter of wire rope used in mining in the Australian market. BBRG Australia explained that regardless of diameter, the price per tonne would be fairly similar. As such BBRG Australia did not make an adjustment to its estimated normal value to account for specification differences.

The Commission notes that the selling price information provided in support of the applicant's claims relates to a period prior to the investigation period, however the relevant sales contract extended to the investigation period. The applicant indexed the selling price relied on by 3 per cent to account for consumer price index (CPI) increases in South Africa to derive a contemporaneous selling price for the investigation period. The Commission accessed the historical South African CPI index table and observed that the applicant's CPI increase of 3 per cent was conservative.<sup>7</sup> The applicant also provided further evidence from its contacts in South Africa to substantiate that the selling price was accurate and is reliable.

Table 8 below summarises the approach taken by the applicant to estimate normal values and the evidence relied upon.

Country	Basis of estimate	Details
South Africa	The normal value was calculated under subsection 269TAC(1) as the price paid or payable for like goods sold in the OCOT for home consumption in the country of export in sales that are arms length transactions by the exporter.	The applicant provided a contractual selling price and market intelligence to support its claims.

**Table 8 – BBRG Australia's normal value methodology**

**3.4.3. The Commission's assessment of normal value**

The Commission has not conducted an investigation into wire rope previously, therefore the Commission does not possess any pricing information that it can compare the applicant's estimates against. In addition, the Commission is not aware of the existence of any independently published pricing information in relation to wire rope sold in South Africa from reputable sources.

Having regard to the requirements of section 269TAC, 269TAAD, and 269TAA, and noting that the applicant has not claimed, and the Commission is not aware that:

- the selling price information provided relates to a transaction which is not arms length;
- there is an absence or low volume of sales of like goods in the country of export;
- the goods were not sold in the OCOT; and
- there is a situation in the South African market such that sales in South Africa are not suitable for determining normal value under subsection 269TAC(1),

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<sup>7</sup> [http://www.statssa.gov.za/publications/P0141/CPIHistory.pdf?](http://www.statssa.gov.za/publications/P0141/CPIHistory.pdf)

the Commission's considers that the applicant's approach in estimating normal values in South Africa is reasonable for the purposes of this report.

The Commission notes that the contractual price information provided in the application does not relate to the investigation period and that in calculating the normal value the applicant has indexed the prior year selling price for CPI. Although this approach does not have regard to price volatilities in the underlying raw materials, e.g. steel, it does adhere to the purported terms of the relevant contract.

The Commission considers that the applicant can only provide such information as is reasonably available to them to evidence their claims. Considering that an Australian entity may not reasonably be expected to possess detailed pricing information from an overseas country and, further, taking into account the supporting market intelligence information provided by the applicant from its affiliated entity in South Africa, the Commission considers that the evidence provided establishes reasonable grounds for estimating the normal value in South Africa under subsection 269TAC(1). The Commission adjusted the normal value in accordance with subsection 269TAC(8) to include an amount for domestic inland transport and handling to ensure the normal value was at FOB terms and thereby ensures a fair comparison between export price and normal value.

An assessment of normal values is at **Confidential Appendix 3**.

### **3.5. Dumping margins**

#### **3.5.1. Legislative framework**

Dumping margins are determined in accordance with the requirements of section 269TACB. Dumping margins are expressed as a percentage of the export price.

Dumping margins and dumping volumes cannot be negligible, otherwise the investigation must be terminated. Whether the dumping margins and dumping volumes are negligible is assessed under section 269TDA.

#### **3.5.2. The Applicant and the Commission's dumping margin estimates**

Table 9 below summarises the dumping margin estimated by the applicant and the dumping margin estimated by the Commission (which is based on revised estimates of export prices as outlined at section 3.3.3). Table 9 also indicates that the Commission is satisfied that the dumping margin and volume of dumped goods are above negligible levels.

Country	The Applicant's estimate	The Commission's estimate <sup>8</sup>	Volume
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<sup>8</sup> The Commission compared the weighted average of export prices over the whole of the investigation period with the weighted average of corresponding normal values over the whole of that period, in accordance with subsection 269TACB(2)(a). The Commission's assessment of dumping forms **Confidential Appendix 4**.

South Africa	62.8 per cent - the applicant calculated this dumping margin using its deductive export price calculations.	24.5 per cent - the Commission has replaced the applicant's export price estimate with the FOB export price estimate it calculated from the ABF import database.	Based on information from the ABF import database, the estimated volume of goods from South Africa that appear to have been dumped is greater than 3 per cent of the total import volume of the goods.
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**Table 9 - Dumping margin estimates**

## **4. Reasonable grounds – injury to the Australian industry**

### **4.1. Findings**

Pursuant to subsection 269TC(1)(c), having regard to the matters contained in the application, and to other information considered relevant, the Commission considers that there appear to be reasonable grounds to support the claims that the Australian industry has experienced injury in the form of:

- loss of sales volume;
- loss of market share;
- price depression;
- price suppression;
- loss of profits;
- reduced profitability;
- reduced sales revenue;
- reduced return on investment;
- reduced capital investment;
- reduced capacity utilisation;
- reduced employment; and
- reduced productivity.

### **4.2. Legislative framework**

Under section 269TG, one of the matters that the Parliamentary Secretary must be satisfied of, in order to publish a dumping duty notice, is that the Australian industry has experienced material injury. This chapter analyses the economic condition of the Australian industry and provides an assessment as to whether the Australian industry has suffered injury.

### **4.3. The Applicant's claims**

#### **4.3.1. Background**

In its application, BBRG Australia claims that the Australian industry has been injured through:

- loss of sales volume;
- loss of market share;
- price depression;
- price suppression;
- loss of profits;

- reduced profitability;
- reduced sales revenue;
- reduced capital investment;
- reduced return on investment;
- reduced capacity utilisation;
- reduced employment; and
- reduced productivity.

#### 4.3.2. Commencement of injury

BBRG Australia claims that injury commenced in 2015, and that loss of sales volume and reduced selling prices had a material impact on its financial position in 2016.

### 4.4. Approach to injury analysis

#### 4.4.1. Legislative framework

The matters that may be considered in determining whether the Australian industry has suffered material injury are set out in section 269TAE.

The Commission has also had regard to the *Ministerial Direction on Material Injury 2012* (Material Injury Direction).<sup>9</sup>

#### 4.4.2. Evidence provided by the Australian industry

As part of its application BBRG Australia provided:

- production, cost and sales data for wire rope on a quarterly basis for the period 1 January 2013 to 31 December 2016 in Appendices A-1 to A-6; and
- other financial data in Appendix A-7 of the application on an annual basis for financial years 1 January 2013 to 31 December 2016 for the purpose of assessing other injury factors.

#### 4.4.3. The Commission's approach

Section 269TAE describes the methods to assess whether the Australian industry is materially injured by the goods alleged to be dumped from the country of export.

The Commission's injury analysis for the purposes of this report is based on:

- the applicants submitted costs, sales and other financial data; and
- ABF import data.

For the purposes of the conducting the injury analysis, the Commission has analysed the applicant's data and injury claims from 1 January 2013 to 31 December 2016 (referred to as the injury analysis period). As the applicant's financial years are from January to December, any references to financial years below are for the period 1 January to 31 December.

The Commission's analysis of injury is at **Confidential Appendix 4**.

### 4.5. Volume effects

BBRG Australia claims that it has experienced injury through volume effects, including loss of sales volume and reduced market share.

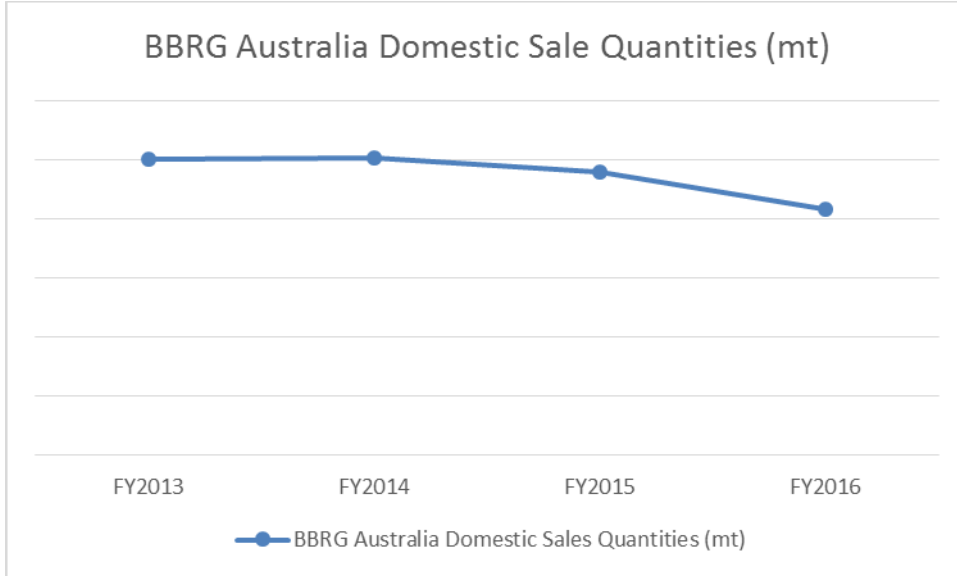
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<sup>9</sup> Available at [www.adcommission.gov.au](http://www.adcommission.gov.au)

**4.5.1. Sales volume**

In its application, BBRG Australia submitted that it has lost sales volume due to the growth in the volume of imports of wire rope from South Africa.

Figure 2 below illustrates the volume of BBRG Australia’s sales of all wire rope in the domestic market throughout the injury analysis period.

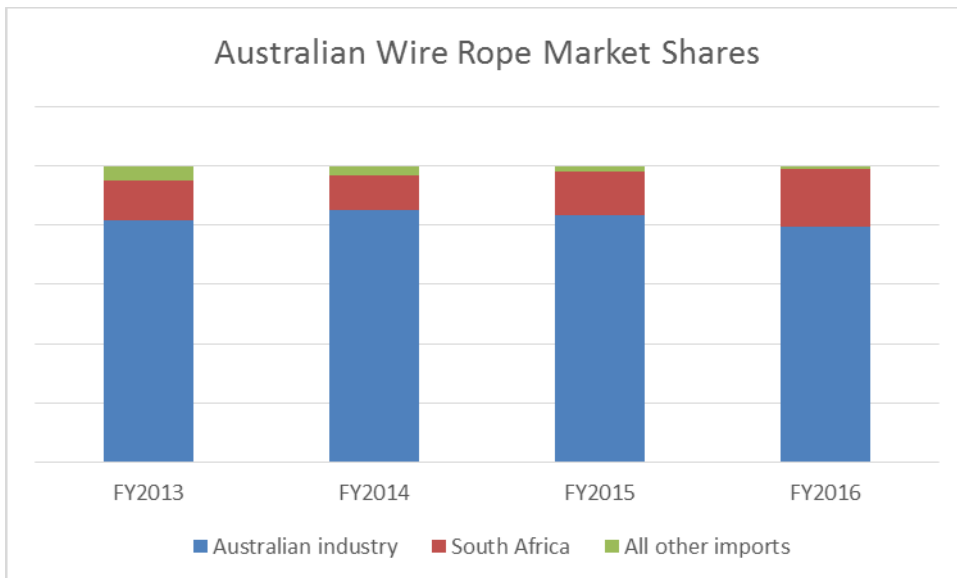


**Figure 2: BBRG Australia’s domestic sales quantity of wire rope**

The Commission observes that BBRG Australia’s sales volumes of wire rope has declined consistently over the injury analysis period, and to the greatest extent in the investigation period.

**4.5.2. Market share**

Figure 3 below shows that the Australian industry gained market share (as per sales volumes) in 2014 but lost market share to imported South African wire rope from 2014 onwards.



**Figure 3: Australian wire rope market share**

**4.5.3. Conclusion – volume effects**

The analysis above supports the applicant’s claims that there appear to be reasonable grounds the applicant’s claims that the Australian industry has suffered injury in the forms of lost sales volumes and loss of market share.

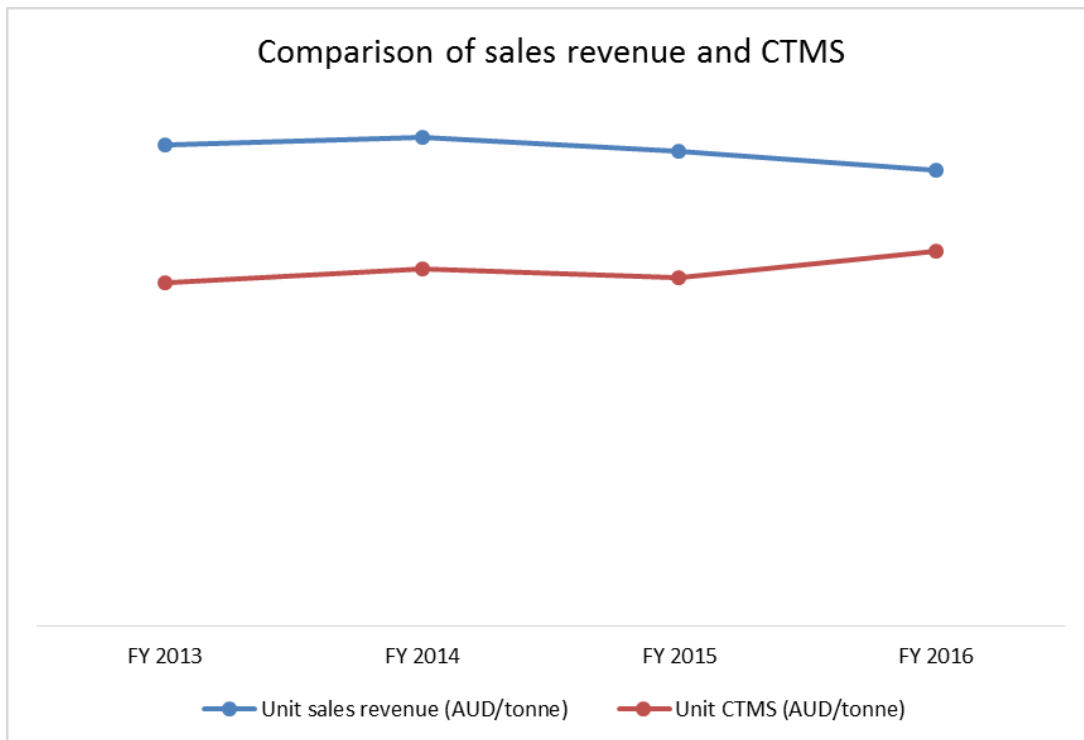
**4.6. Price effects**

**4.6.1. Price depression and price suppression**

Price depression occurs when a company, for some reason, lowers its prices. Price suppression occurs when price increases, which otherwise would have occurred, have been prevented. An indicator of price suppression may be the margin between prices and costs.

BBRG Australia contends that it has experienced injury in the form of price depression and price suppression. BBRG Australia claims that due to lost sales volumes to dumped goods from South Africa, production volumes have declined leading to higher unit fixed and SG&A costs. BBRG Australia contends that the increase in costs, along with downwards pressure on its selling prices as a result of dumped goods, have led to price suppression.

Figure 4 below illustrates the movements and relationship between the applicant’s unit CTMS and unit sales revenue for wire rope.



**Figure 4: BBRG Australia’s unit sales revenue and unit CTMS for wire rope**

Figure 4 demonstrates that over the injury analysis period BBRG Australia’s unit sales revenue declined by 5.3 per cent, while unit CTMS increased by 9.3 per cent. BBRG Australia contends that the reduction in unit sales revenue is an attempt to maintain sales volumes whilst competing and responding to dumped imports from South Africa.

#### 4.6.2. Conclusion – price effects

Based on the above analysis, there appear to be reasonable grounds to support the applicant’s claim that the Australian industry has suffered injury in the form of price depression and price suppression.

### 4.7. Profit and profitability effects

#### 4.7.1. Loss of profit and reduced profitability

BBRG Australia claims that as a consequence of volume and price effects from dumped imports from South Africa, it has experienced injury through loss of profits and reduced profitability.

Figure 5 below charts BBRG Australia’s total profit and unit profitability over the injury analysis period.

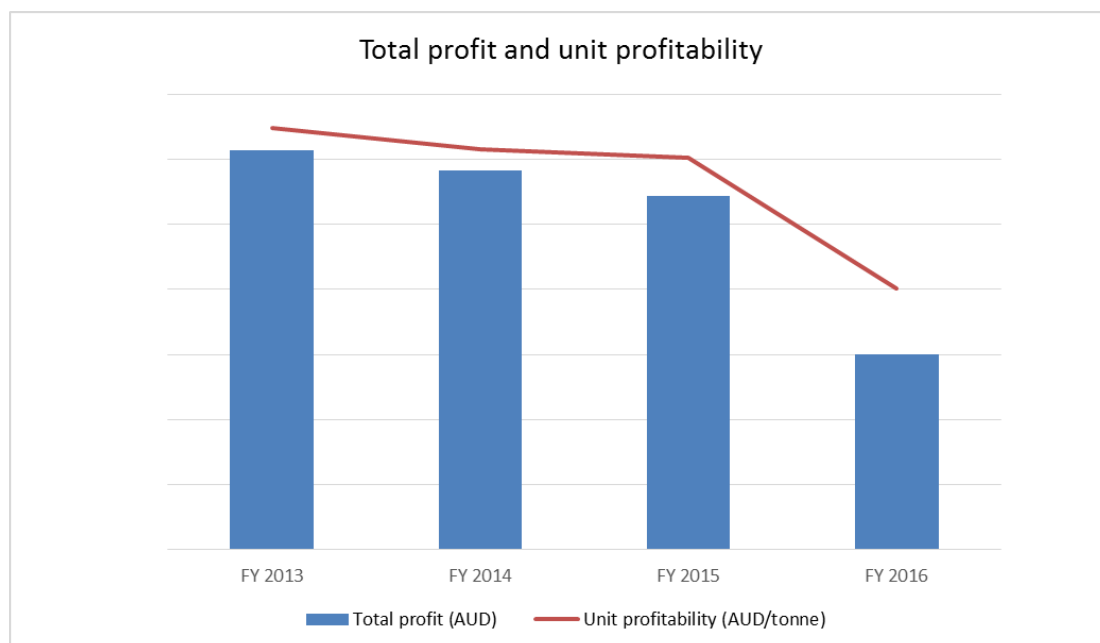


Figure 5: BBRG Australia’s total profit and unit profitability for wire rope sales

Figures 3, 4 and 5 show that a combination of reduced unit selling revenues, higher unit CTMS and reduced sales volumes, appear to have impact profits.

#### 4.7.2. Conclusion – profit effects

Based on the above analysis, there appear to be reasonable grounds to support the claim that the Australian industry experienced injury in the form of loss of profits and reduced profitability.

### 4.8. Other injury factors

#### 4.8.1. Discussion

BBRG Australia completed Confidential Appendix A-7 for the injury analysis period. In relation to other injury factors, the applicant identified the following economic indicators in which it suffered injury:

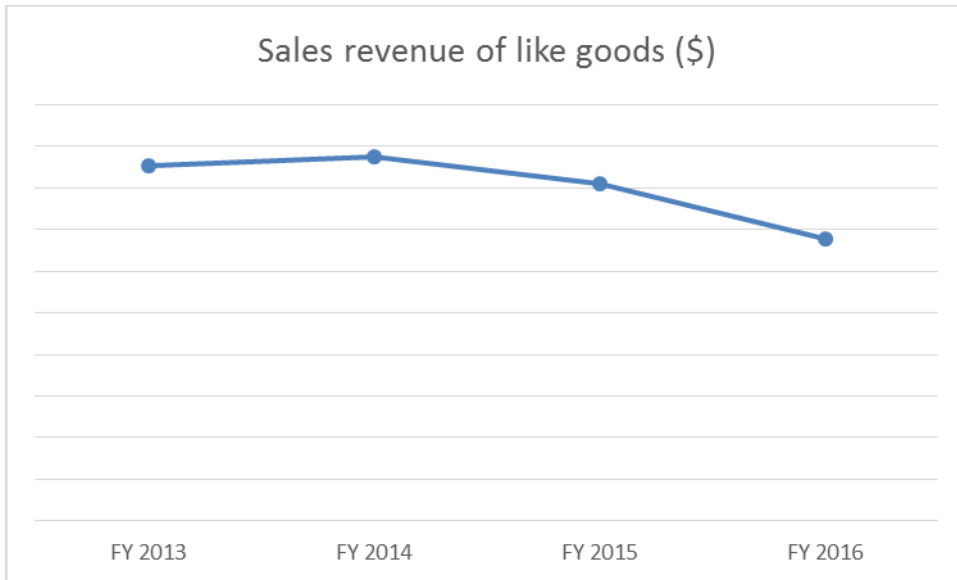
- reduced sales revenue;
- reduced capital investment;
- reduced return on investment;

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- reduced capacity utilisation;
- reduced employment; and
- reduced productivity.

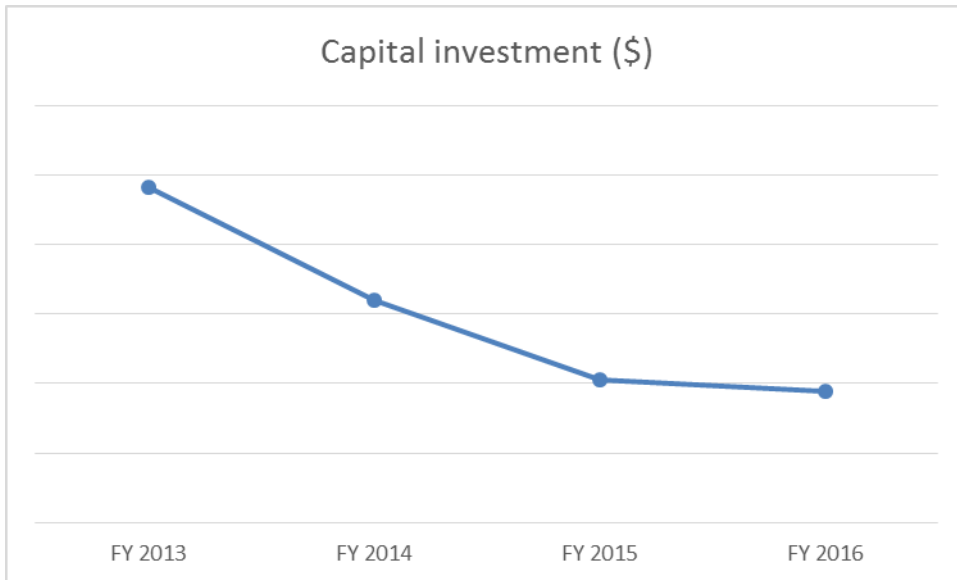
The Commission has analysed the applicant’s Appendix A-7 data and makes the following observations.

Figure 6 below indicates that BBRG Australia’s sales revenues increased between 2013 and 2014, however, sales revenues decreased substantially after 2014, particularly in the investigation period.



**Figure 6: BBRG Australia’s sales revenues of like goods**

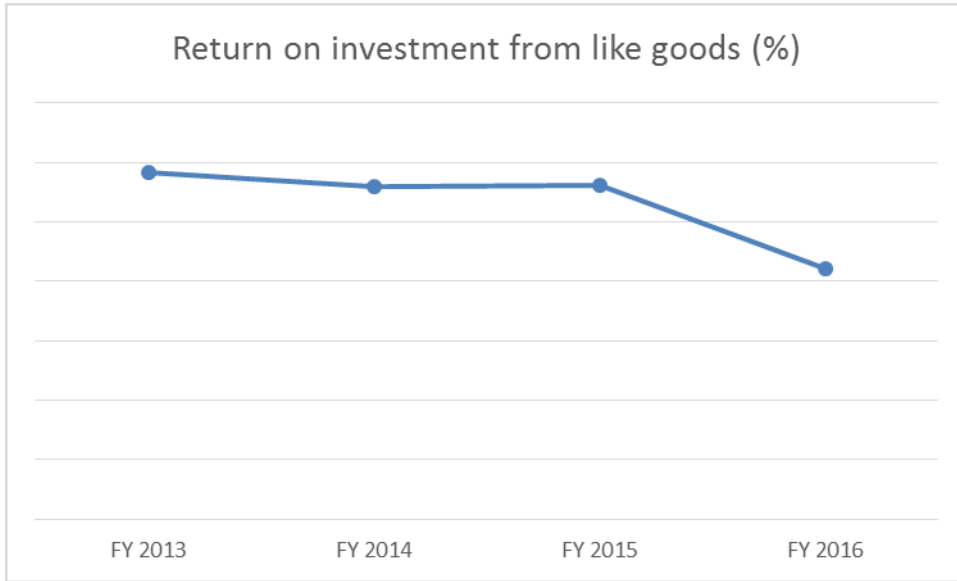
Figure 7 below shows that BBRG Australia’s company-wide capital investment has decreased consistently throughout the injury analysis period.



**Figure 7: BBRG Australia’s company-wide capital investment**

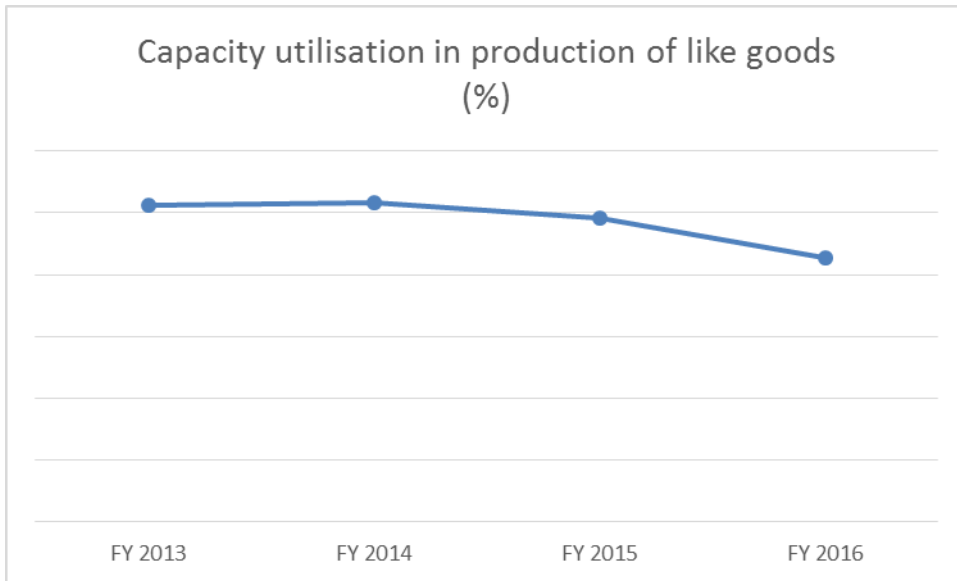


Figure 8 depicts BBRG Australia’s return on investment calculated for the like goods. The Commission observes that there was a significant reduction in return of investment in the investigation period.



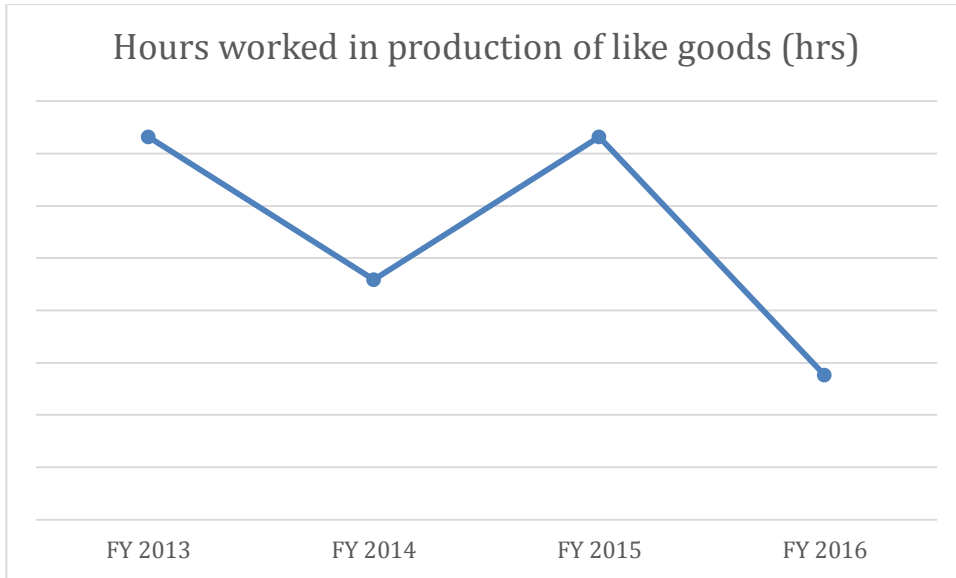
**Figure 8: BBRG Australia’s return on investment - like goods**

Figure 9 shows the capacity utilisation in production of like goods by BBRG Australia, which shows a constant reduction in capacity utilisation from 2014.



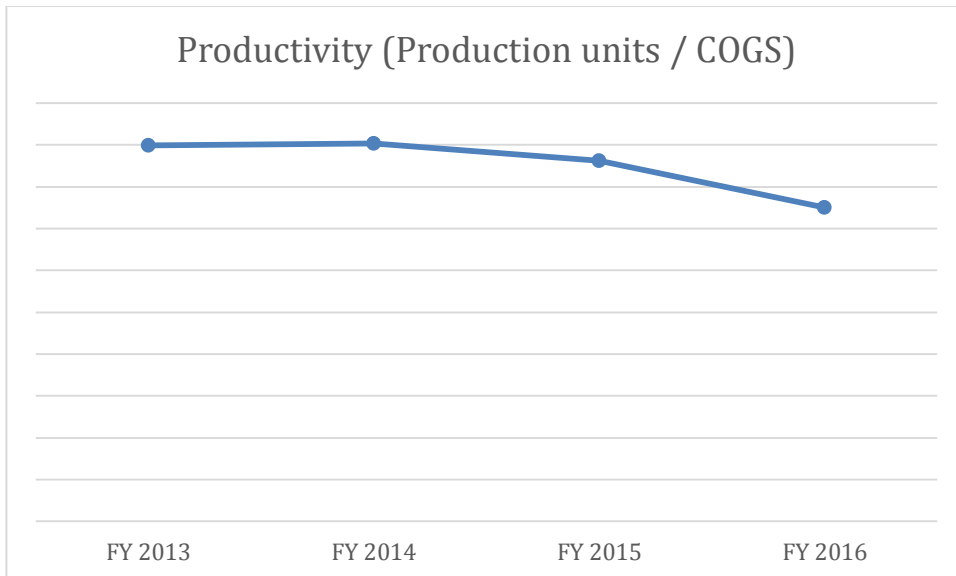
**Figure 9: BBRG Australia’s capacity utilisation ratios for the production of like goods**

Figure 10 shows BBRG Australia’s production hours spent in manufacturing of like goods. Figure 10 shows fluctuation over the injury analysis period, with a significant drop in production hours in the investigation period.



**Figure 10: Total labour hours spent in production of like goods**

Figure 11 below depicts BBRG Australia’s productivity for like goods in production, calculated as the total number of units produced divided by the total cost of goods sold (total COGS). Figure 11 indicates that BBRG Australia’s productivity for like goods in production is falling consistently over the injury analysis period.



**Figure 11: BBRG Australia’s like goods production productivity measured as production units / COGS ratio**

**4.8.2. Conclusion – other injury factors**

Based on the above, the Commission considers that there appears to be reasonable grounds to consider that BBRG Australia experienced injury in the forms of:

- reduced sales revenue;
- reduced capital investment;
- reduced return on investment;
- reduced capacity utilisation;
- reduced employment; and

- reduced productivity.

BBRG Australia's performance in relation to the other injury factors will be further examined during the course of the investigation.

#### **4.9. Conclusion – injury**

Based on the findings of this chapter, the Commission considers that there appear to be reasonable grounds to support the claims that the Australian industry has experienced injury in the form of:

- loss of sales volume;
- loss of market share;
- price depression;
- price suppression;
- loss of profits;
- reduced profitability;
- reduced sales revenue;
- reduced return on investment;
- reduced capital investment;
- reduced capacity utilisation;
- reduced employment; and
- reduced productivity.

## 5. Reasonable grounds – causation factors

### 5.1. Findings

Having regard to the matters contained in the application, and to other information considered relevant, the Commission considers that there appear to be reasonable grounds to support the claims that the Australian industry has suffered injury caused by dumping, and that the injury is material.

### 5.2. Cause of injury to the Australian industry

#### 5.2.1. Legislative framework

Under section 269TG, one of the matters that the Parliamentary Secretary must be satisfied of in order to publish a dumping duty notice is that the material injury suffered by the Australian industry was caused by dumping. This issue is considered in this chapter.

Matters that may be considered in determining whether the Australian industry has suffered material injury caused by dumped or subsidised goods are set out in section 269TAE.

### 5.3. The Applicant's claims

Table 10 below summarises the causation claims of the applicant.

Injury caused by dumping
BBRG Australia claims that it experienced material injury due to allegedly dumped imports of wire rope from South Africa because imported products and its products compete head-to-head in the market and lower priced dumped imports caused price, volume and profit injury. BBRG Australia also claimed that its lost sales volumes in turn increased its CTMS by increasing the unit fixed costs and unit SG&A.
Injury caused by other factors
BBRG Australia has acknowledged that there has been a contraction in demand in the mining industry but contends that the impact on wire rope demand was less apparent as many of the mines have continued in operation, and only a handful have closed, or 'parked' machines resulting in a contraction in demand. BBRG Australia states that overall, mining companies have produced at high volumes during the injury analysis period.

Table 10 – Applicant's causation claims

#### 5.3.1. The Commission's approach to causation claims

The Commission assessed BBRG Australia's claims in relation to the causal link between material injury and allegedly dumped imports of wire rope from South Africa. In conducting the assessment, the Commission relied on data from the ABF import database and information provided by BBRG Australia in its application, including Appendices B-1 and B-2. Information provided by the applicant included its sales listings and market intelligence (price offers) from the importer of the allegedly dumped goods.

#### 5.3.2. Size of dumping margin

Under subsection 269TAE(1)(aa), in assessing whether an Australian industry has (among other things) suffered injury, the Parliamentary Secretary may have regard to the dumping margin in respect of the goods exported to Australia. As explained in

section 3.5.2 of this report, the Commission estimates that the dumping margin for the investigation period is 24.5 per cent. The Commission is satisfied that the dumping margin in and of itself, is likely to have enabled importers of the goods from South Africa to have a competitive advantage on price compared to the Australian industry.

### **5.3.3. Volume effects**

As discussed in sections 4.5.2 and 4.5.3, the Commission considers that there appear to be reasonable grounds to assert that the applicant has lost sales volumes and market share for wire rope in relation to the investigation period. The Commission notes that, based on the applicant's estimate (which was consistent with data from the ABF import database), the goods (as defined in section 2.3 of this report) are predominantly imported from South Africa during the investigation period. The Commission further notes that the applicant's estimated import volumes of the goods from South Africa broadly reconciles with the Commission's estimates of the import volumes of the goods from South Africa which was sourced from the ABF import database. The Commission also notes that:

- the applicant's estimates and data from the ABF import database does not appear to show significant volumes of the goods imported from countries other than South Africa;
- BBRG Australia is the only producer of the goods in Australia; and
- other factors identified at section 5.3.1 below do not appear to have caused the volume injury (noting that dumping need not be the sole cause of injury as per the Material Injury Direction).

As a result, the Commission considers that there appear to be reasonable grounds to assert that the allegedly dumped imports of wire rope from South Africa have caused the Australian industry to lose sales volumes and market share during the investigation period.

### **5.3.4. Price effects**

#### Price undercutting

Price undercutting occurs when imported product is sold at a price below that of the Australian industry.

The evidence in the application supporting price undercutting predominantly relies on market intelligence (price offers in the Australian market of the imported goods from South Africa) gathered by the applicant. To test the reasonableness of the evidence provided by the applicant, the Commission conducted a separate price undercutting analysis. The Commission first calculated reasonable amounts for post exportation expenses and profits of the importer using the price offers provided by the applicant. In doing so, the Commission eliminated the transactions that appeared to be statistical outliers. The Commission then calculated monthly free into store (FIS) prices by adding the weighted average post exportation expenses and importer's profit to the weighted average monthly FOB prices from the ABF import database. The Commission undertook this exercise to calculate monthly FIS prices of the wire rope imported from South Africa, because the market intelligence provided by the applicant did not cover the whole injury analysis period. The Commission only calculated FIS prices for imports from South Africa commencing from 2015 because, as mentioned

previously, the dedicated statistical class codes (91 and 92) did not exist before that date and the data in ABF import database included significant quantities of other types of products which made it difficult to calculate a reliable FOB export price for the goods in earlier years. Figure 12 below depicts the Commission’s price undercutting analysis.

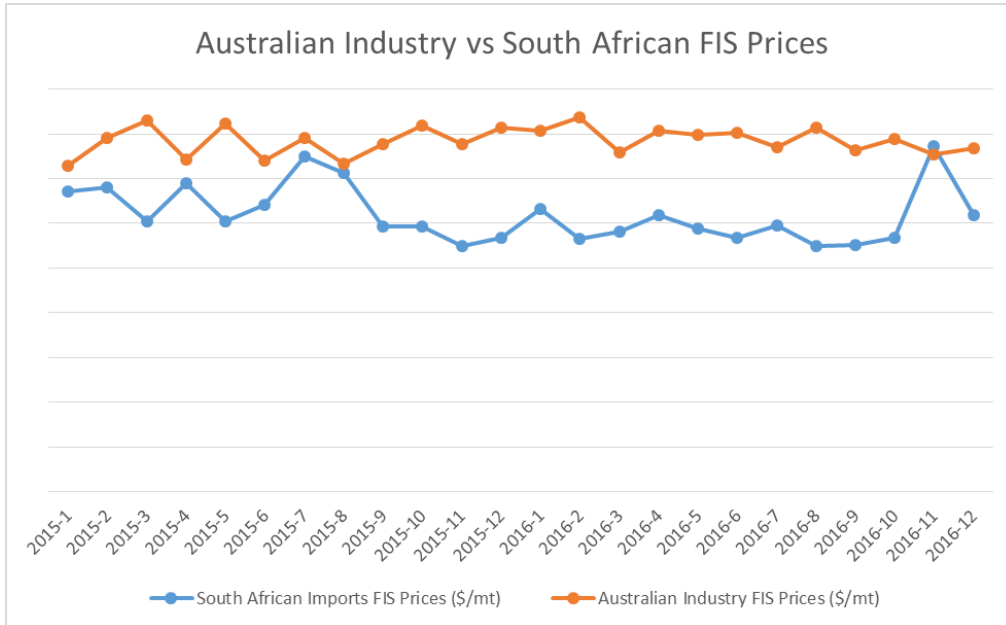


Figure 12: Price undercutting in 2015 and 2016

Based on the above analysis, there appears to be reasonable grounds to support the applicant’s claim that the Australian industry has experienced price undercutting by imports of wire rope from South Africa.

Price depression and price suppression

Figure 13 below depicts BBRG Australia’s quarterly unit CTMS and unit selling prices between 2013 and 2016. The Commission observes from Figure 13 that BBRG Australia’s unit selling prices declined in 2015 in comparison to 2014 and although it recovered slightly in the quarter 4 of 2015, unit selling prices further declined in the investigation period.

The Commission further observes that the difference between BBRG Australia’s unit selling prices and unit CTMS has contracted between the start of 2015 and the end of the investigation period.

Based on the observations above, the Commission considers that there appears to be reasonable grounds to consider that the Australian industry has experienced price suppression and price depression starting from 2015 and that these price effects are more recognisable in the investigation period which coincides with increased volumes from South Africa, the estimated dumping margins and the price undercutting observed above.

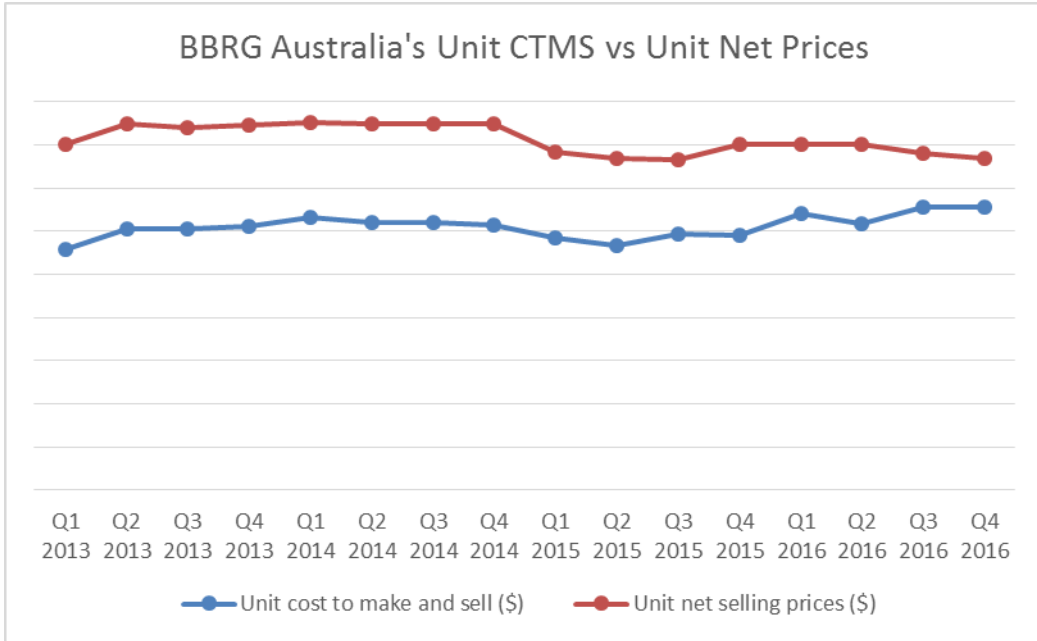


Figure 13: BBRG Australia’s unit CTMS vs unit selling prices – 2013 to 2016

5.3.5. Profit effects

Figure 14 below shows that BBRG Australia’s total profits and unit profitability were fairly static in earlier periods, but declined in all but one quarter of 2015 and the investigation period.

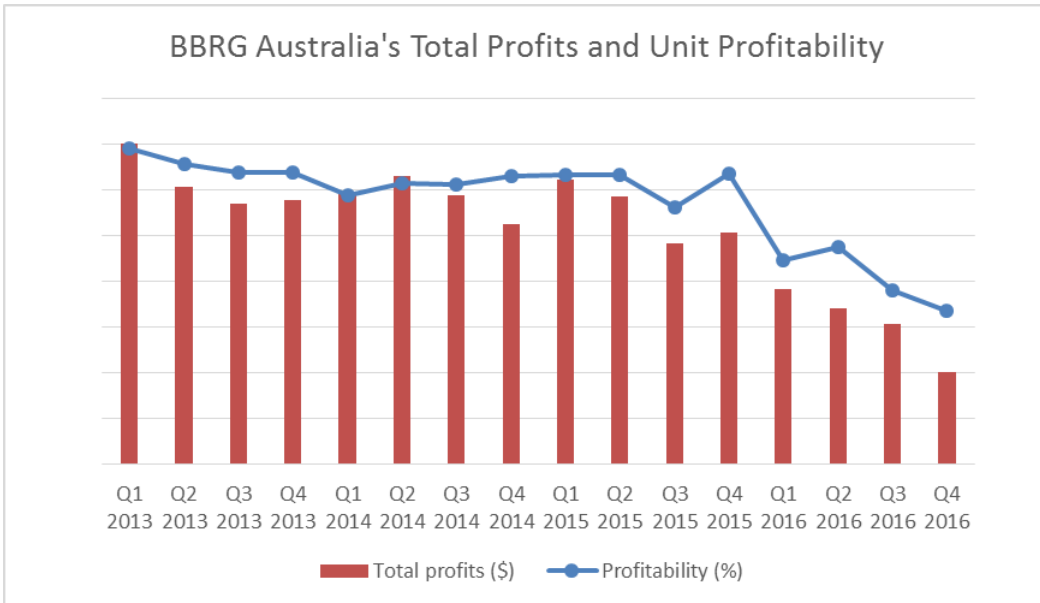


Figure 14: BBRG Australia’s total profits and unit profitability - 2015 to 2016

The Commission considers that there appears to be reasonable grounds to assert that the estimated dumping margins, volume effects, price effects and price undercutting of the goods from South Africa contributed to the Australian industry’s deterioration in profit and profitability in the investigation period.

The Commission’s price and profitability analysis is at **Confidential Appendix 6**.

### 5.3.6. Comparison of export prices and non-injurious price

As an additional factor to establish whether there is a causal link between the allegedly dumped goods and material injury, the Commission sought to compare weighted average export prices of allegedly dumped imports with an estimate of a non-injurious price (NIP) for the 12 months ending 31 December 2016.

To calculate the estimated NIP, the Commission established an unsuppressed selling price (USP) using the Australian industry's weighted average selling prices in 2015 which is considered to be a period not affected by dumping.

The Commission then deducted amounts from that USP for post exportation costs (including into-store costs, Customs duty and overseas freight) and the importer's profit. These amounts were calculated using the price offers provided by the applicant. The NIP has been calculated at FOB terms.

The weighted average export price for the investigation period was lower than the NIP. The Commission considers this to be a reasonable indicator of injury to the Australian industry for the purposes of this report.

The Commission's NIP calculations and a comparison with export price is at **Confidential Appendix 7**.

### 5.3.7. Other possible factors of injury

In its application, BBRG Australia acknowledged that there has been a contraction in demand in the mining industry. However, it contends that the impact on wire rope demand was less apparent as many of the mines have continued in operation, and only a handful have closed, or 'parked' machines. BBRG Australia states that overall, mining companies have produced at high volumes during the injury analysis period and that wire rope, as a consumable in open cut mining applications, remains in demand.

In order to assess the applicant's claims, the Commission considered various publications including the Department of Industry, Innovation and Science's *Resources and Energy Quarterly, March 2017*<sup>10</sup> and the *Government of Queensland - The Department of Natural Resources and Mines' Open Cut Coal Mining Statistics*<sup>11</sup> and observed that the open cut coal mining total production rates did not show any significant decrease over the last five years. As a result, the Commission considers that the data available supports the applicant's claims that the contraction in demand in the mining sector is not the sole cause of its material injury.

The Commission will further examine this and other possible factors of injury in detail as the investigation progresses.

## 5.4. Conclusion – material injury caused by dumping

The Commission has examined the application and is satisfied that, based on the:

- substantial volume of imports of the goods from South Africa;
- size of the estimated dumping margin;
- preliminary assessment of price undercutting; and

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<sup>10</sup> <https://industry.gov.au/Office-of-the-Chief-Economist/Publications/Pages/Resources-and-energy-quarterly.aspx>

<sup>11</sup> <https://data.qld.gov.au/dataset/coal-industry-review-statistical-tables/resource/9c3c1aaf-0afa-4e58-b67c-75c0d3574abd>



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- volume, price and profit effects outlined above,

there appear to be reasonable grounds to support the applicant's claim that dumping of wire rope exported to Australia from South Africa has caused material injury to the Australian industry.

Accordingly, the Commission recommends that the Commissioner decide not to reject the application and initiate an investigation. If the Commissioner agrees with these recommendations, the Commissioner must give public notice of the decision (**Non-Confidential Attachment 1**) in accordance with the requirements set out in subsection 269TC(4).

## **6. Appendices and Attachments**

<b>Appendices</b>	<b>Confidentiality</b>	<b>Title</b>
Appendix 1	Confidential	Market size assessment
Appendix 2	Confidential	Export price calculations
Appendix 3	Confidential	Normal value calculations
Appendix 4	Confidential	Dumping margin calculations
Appendix 5	Confidential	Injury assessment
Appendix 6	Confidential	Price and profitability assessment
Appendix 7	Confidential	NIP assessment

<b>Attachments</b>	<b>Confidentiality</b>	<b>Title</b>
Attachment 1	Non-confidential	Public notice