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1<sup>st</sup> August 2016

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Anti-dumping Commission  
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**INVESTIGATION 355: STEEL SHELVING UNITS FROM THE PEOPLE'S REPUBLIC OF CHINA**

**Submission by exporter – Guangdong Guanyu Metal Products Co., Ltd. (Guanyu Metal)  
Argumentation of excluding Guanyu Metal's products from the investigation**

Dear Ryan:

I write on behalf of my client – exporter Guanyu Metal to express our opinion on why the products produced by Guanyu Metal shall be excluded from the investigation.

Summit Select Pty Ltd., (Summit), the applicant, has excluded certain products from the investigation in its application. Among those excluded goods, there is one product called “slotted angle shelving”. Later on 22<sup>nd</sup> July 2016, Summit submitted an elaborate definition of the excluded goods – slotted angle shelving.

Guanyu Metal itself produces steel shelving units and exports some of them to Australia, which makes it the interested party. However, Guanyu Metal believes that one kind of its shelves called by itself slotted angle shelving is very much like that excluded and described by Summit. So, we believe Guanyu Metal's “slotted angle shelving” is the same kind as that described by Summit, and this shelving of Guanyu Metal shall be excluded from the investigation.

**FIGURES OF GUANYU METAL'S SLOTTED ANGLE SHELVING**

There are two kinds of “slotted angle shelving” produced by Guanyu Metal – concealed and

not concealed. The pictures of two kinds shelving are as follows:

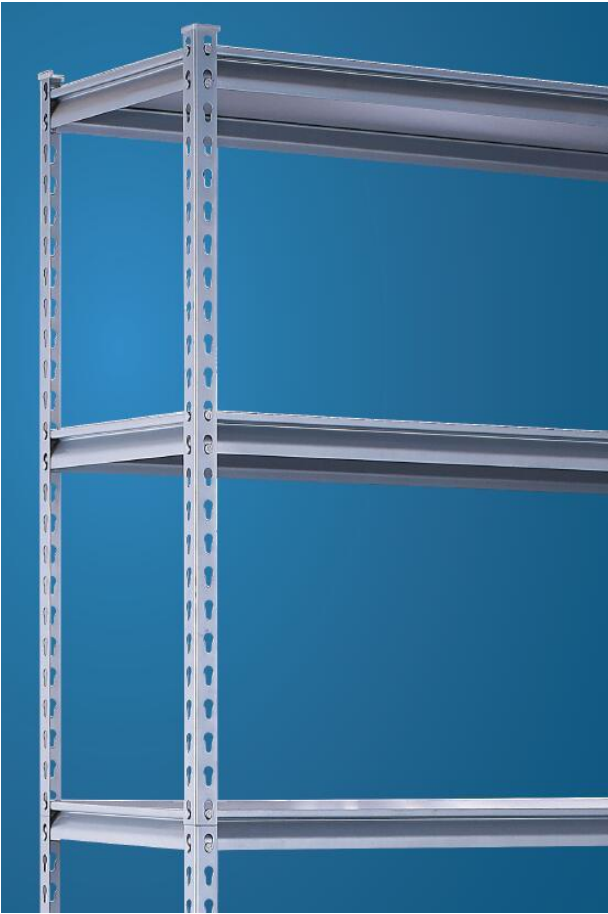


Figure 01 (left): non-concealed slotted angle shelving  
Figure 02 (right): non-concealed slotted angle shelving



Figure 03: Concealed slotted angle shelving

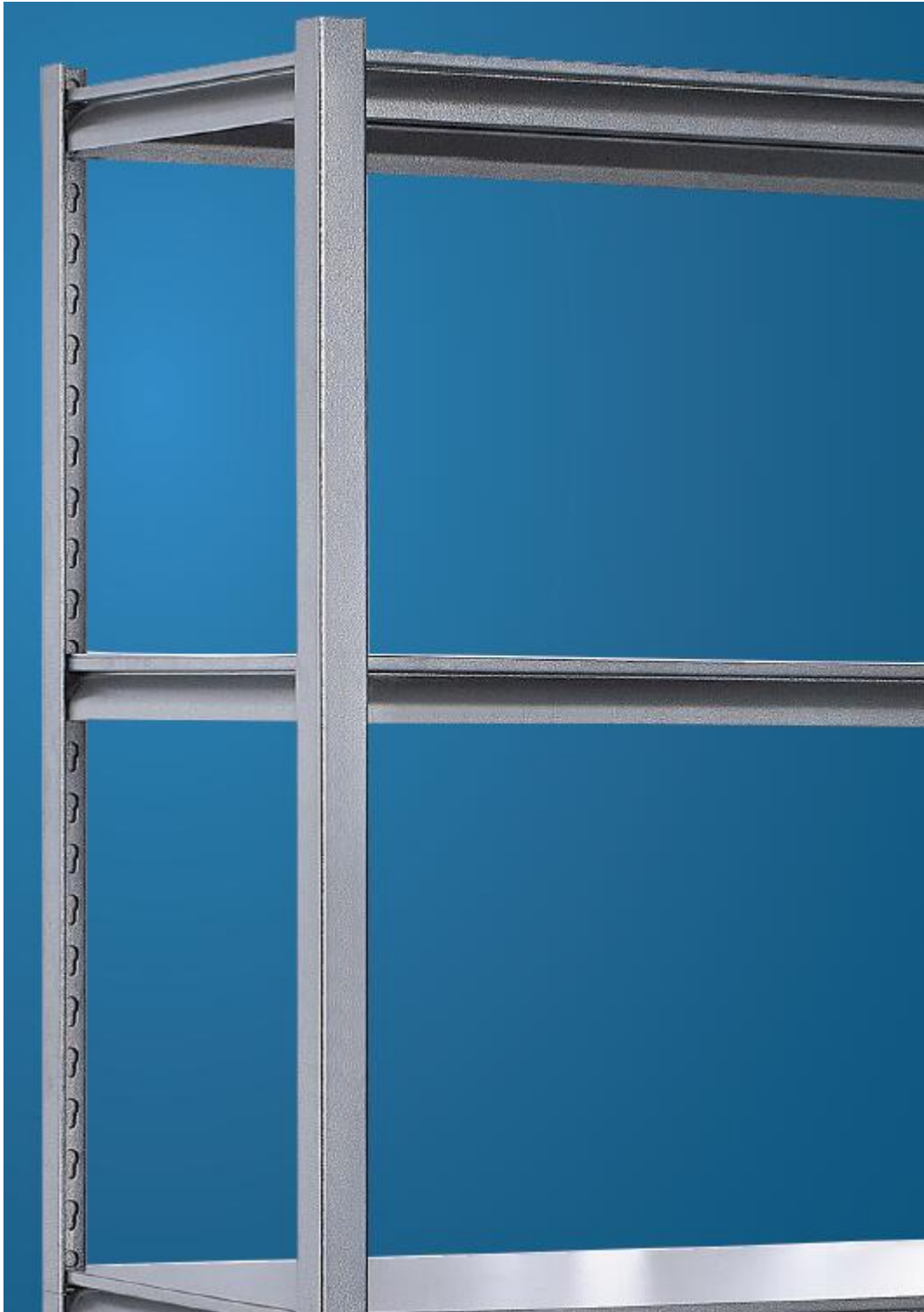


Figure 4: Concealed slotted angle shelving

The major difference between the two kinds of slotted angle shelving lies on whether the punched holes on the posts (legs) are punched through (penetrated). If the holes are not punched through, the outer layer of the posts is a smooth flat. Since the holes cannot be seen from the outside and are concealed, this kind of shelving is called concealed slotted

angle shelving.

Except for the difference on outer layer of posts, the two kinds of slotted angle shelving are same at all characteristics. The two are made of the same raw materials by same production process. The installment method of the two kinds is the same, which is connecting posts and beams using the pre-punched holes on or inside the posts.

## **COMPARISON BETWEEN SLOTTED ANGLE SHELVINGS OF GUANYU METAL AND SUMMIT**

We believe the slotted angle shelving produced by Guanyu Metal is the same kind as that of Summit. We think the two products are same in the following characteristics:

### **Raw Material**

According to our knowledge, the posts and beams of “slotted angle shelving” of Summit are made of steel such as hot rolled coil (HRC) and galvanized steel, and its shelves are made of various materials including wood, MDF or steel. The content listed above has no difference with that of Guanyu Metal.

### **Production Process**

The “slotted angle shelving” of Summit shares the same production process with that of Guanyu Metal. Summit’s slotted angle shelving follows the production process of punching, forming and package, which is identical with that followed by Guanyu Metal’s slotted angle shelving.

As we can see, the posts and beams of Summit’s slotted angle shelving have same figure and porous structure, which is different with Guanyu Metal’s slotted angle shelving whose beams do not have holes. However, we think this is a minor difference considering the majority of similarity.

### **Installment & Usage**

The “slotted angle shelving” of Summit is installed by joining posts and beams with bolts. While the slotted angle shelving of Guanyu Metal is also installed by connecting posts and beams together, but with no bolts. Despite the above differences, the installment process and method of two kinds are basically the same, that is using the pre-punched holes to connect multiple steel sections to form customized storage systems.

## **CONCLUSION**

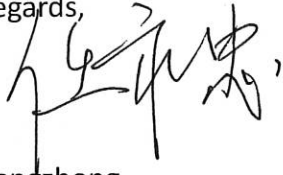
To conclude, considering that the slotted angle shelving of Guanyu Metal and Summit uses

same raw materials, follows same production process, and shares the same installment process, we believe the two are identical. Hence, we argue that Guanyu Metal's slotted angle shelving, whether concealed or not concealed, shall be excluded from the investigation.

In addition, we have reached a consensus that the shelving units with wire shelves produced by Guanyu Metal are excluded from the investigation. And it is worthy to be mentioned that Guanyu Metal also produces industrial shelving (which is called as Industrial Rack by Guanyu Metal itself) that matches with the description of industrial shelving provided by Summit, and shall also be excluded from the investigation.

We hope you can accept our argumentation.

Kind regards,

A handwritten signature in black ink, appearing to be 'Ren. Yongzhong', written in a cursive style.

Ren. Yongzhong

Partner of Beijing DeHeng Law Offices