PONTINUATION INQUIRE

POLITARYL CHLORIDE HOMOPOLYMER RESIN (PVC)

EXPORTED FROM

JAPAN

AND

REVIEW OF ANTI-DUMPING MEASURES

PVC

EXPORTED FROM

THE UNITED STATES OF AMERICA AND JAPAN

VISIT REPORT - AUSTRALIAN INDUSTRY

AUSTRALIAN VINYLS CORPORATION PTY LTD

This report and the views and recommendations contained therein will be reviewed by the case management team and may not reflect the final position of Customs and Border Protection

March 2012

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### EACHGPOUND

#### 2.1 The continuation inquiry

On 9 December 2011, the Australian Customs and Border Protection Service (Customs and Border Protection) published a notice in *The Australian* newspaper inviting certain persons to apply to the Chief Executive Officer (CEO) of Customs and Border Protection for the continuation of anti-dumping measures that apply to polyvinyl chloride homopolymer resin (PVC) exported to Australia from Japan. On 7 February 2012, Australian Vinyls Corporation Pty Ltd (Australian Vinyls), the sole manufacturer of PVC in Australia, lodged an application for the continuation of the anti-dumping measures. The current anti-dumping measures on imports from Japan are due to expire on 21 October 2012.

Following consideration of the application the inquiry was initiated on 24 February 2012. Public notification of initiation of the inquiry was made in *The Australian* on 24 February 2012. Australian Customs Dumping Notice (ACDN) No. 2012/09 provides further details of the inquiry and is available at <a href="https://www.customs.com.ac.gov.ac.

#### 2.2 The review

On 2 February 2012, Chemiplas Australia Pty Ltd (Chemiplas) lodged an application for a review of the anti-dumping measures applying to PVC exported to Australia from Japan and the United States of America.

Following consideration of the application the review was initiated on 24 February 2012. ACDN No. 2012/08 provides further details of the review and is available at <a href="https://www.customs.gov.au">www.customs.gov.au</a>.

#### 2.3 Existing measures

Anti-dumping measures were imposed on PVC resin from Japan in October 1992 and have since been subject to continuation inquiries every five years. The current measures for Japan are due to expire on 21 October 2012.

Anti-dumping measures were imposed on PVC resin from the USA in January 1992 and have recently been continued for a further five years; International Trade Remedies Report No 174 (REP 174) refers, and will apply to 23 January 2017 unless revoked earlier.

Measures imposed before 1 January 1993 ('old measures') are reviewed using the provisions of section 269TAD of the *Customs Act 1901* (the Act¹) which were repealed in 1992 but remain in force under transitional arrangements.

<sup>&</sup>lt;sup>1</sup> A reference to a division, section or subsection in this report is a reference to a provision of the Act, unless specified.

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Section 233TAD provided that the himister for Home Affairs (the ivilinister), if satisfied that any factor relevant to the ascertainment of normal values had altered, may reascertain normal values.

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The non-injurious free on board prices (iNIFOBs) may be varied according to subsection 8(5) of the Customs Tariff (Anti-Dumping Act) 1975, by virtue of section 33(3) of the Acts Interpretation Act 1901 which provides that where an Act confers a power to issue an instrument the power shall be construed as including a power to vary the instrument.

There are no fegislative timeframes for the completion of reviews under section 269TAD of the Act however the practice is to follow the same manner and time frame as reviews of the post 1 January 1993 measures.

Division 5 of Part XVB of the Act sets out, among other things, the procedures to be followed by the CEO in dealing with an application for the review of measures imposed from 1 January 1993.

#### 2.4 Furpose of visit

We explained to Australian Vinyls that the purpose of our visit was to:

- discuss the company's claims relating to the continuation of the anti-dumping measures;
- discuss the review process and application made by Chemiplas
- discuss procedural matters relating to the continuation inquiry and the review;
- verify information provided in the application, including sales and cost information;
- collect and verify other information relevant to the inquiry;
- discuss whether the expiration of the anti-dumping measures would lead (or would be likely to lead) to a continuance of (or recurrence of) the material injury that the anti-dumping measures were intended to prevent;
- give the company the opportunity to provide any further comments or raise any further issues it believed relevant to the investigation; and
- discuss methods to establish an unsuppressed selling price.

#### 2.5 Contact details

| Company:  | Australian Vinyls Corporation Pty Ltd   |  |
|---|---|--|
| Address:  | 65 Leakes Road, LAVERTON NORTH VIC 3026   |  |
| Telephone:  | 03 9368 6221  |  |
| Fax:  | 03 9368 4881  |  |
| Date of visit   | 22-23 March 2012  |  |
| Australian Vinyls<br>Corporation<br>(Australian Vinyls) | Peter Flinn, Sales and Marketing Manager<br>Ian Owens, Commercial Manager<br>Adnan Fetai, Accountant        |  |
| Consultant  | Mr John O'Connor  |  |
| Customs and Border Protection Service                   | John Bracic, Director, Operations 1 Rod Jones, Manager, Operations 1 Rachel Lohan, Supervisor, Operations 1 |  |

#### **PUBLIC RECORD**

#### 2.6 Investigation process and timeframes

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We advised Australian Vinyls that the inquiry and review would follow the same timelines, but that separate statements of essential facts (SEFs) and final reports would be issued. We outlined the processes and timeframes as follows:

- Initiation dates, 24 February 2012:
- Submissions, including exporter questionnaires, due by 4 April 2012;
- statements of essential facts (SEFs) due by 13 June 2012;
- submissions in response to SEFs due by 3 July 2012;
- final reports to Minister due by 30 July 2012.

In regards to the continuation inquiry in accordance with section 269ZHF the CEO must give a report to the Minister recommending that the Minister either:

- a) takes steps to secure the continuation of the anti-dumping measures the subject of the application or;
- b) that the anti-dumping measure expire on the specified expiry date.

We also explained that the CEO must not recommend that the Minister take steps to secure the continuation of the anti-dumping measures unless the CEO is satisfied that the expiration of the measure would lead, or would be likely to lead, to a continuation of, or a recurrence of, the anti-dumping measure is intended to prevent.

We advised Australian Vinyls that the review will examine only the NIFOB and normal values, (the variable factors), and that export prices are not a variable factor subject to a review under 'old measures'. At the conclusion of the review the Minister may set new variable factors or leave them unchanged. We also advised Australian Vinyls that revocation of the measures will not be examined during this review.

We informed Australian Vinyls that we would compile a confidential report on the visit, and provide the opportunity for Australian Vinyls to comment on the accuracy of the report. Following approval of this report a non-confidential version would then be prepared for the public record.

We also informed Australian Vinyls that all information provided by Australian Vinyls to Customs and Border Protection would be treated as confidential unless advised otherwise.

We explained the operation of the public file system, and the opportunity for Australian Vinyls and all interested parties to comment on reports and submissions placed on the public record, in particular the statements of essential facts for the continuation and review.

# COMPAIN BACKGROUND

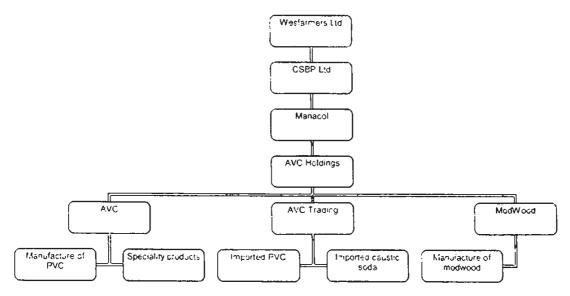
#### 3.4 Sampany structure

Australian Vinyls was established in 1997 as a joint venture of the two PVC resin manufacturing operations then existing in Australia: ICI Vinyls (now Orica Australia Pty Ltd) and Auseon Limited (now PolyOne). Australian Vinyls became a wholly owned subsidiary of AVC Holdings Pty Ltd (AVC Holdings) in 2002. AVC Trading Pty Ltd (AVC Trading) was also formed in 2002 to import PVC.

In June 2004 AVC Holdings acquired a majority interest of 65% (and then acquired the remaining 35% interest in July 2005) in a company, i/led/Veod Technologies Pty Ltd (ModWood). ModWood manufactures decking board from recycled milk bottles.

In June 2005 Australian Vinyls management, Colonial First State Investments Ltd and Colonial First State Private Capital Ltd formed a new company. Manacol Pty Ltd (Manacol). Manacol then acquired 100% of the shares in AVC Holdings. in September 2007, Mancol's shares were acquired by CSBP Ltd, which is 100% owned by Wesfarmers Ltd.

The company group structure is illustrated in the following diagram.



Australian Vinyls has the following product streams:

- locally manufactured PVC; and
- specialty products (plasticisers, stabilisers and impact modifiers and processing aids for extruders) for resale.

AVC Trading has the following product streams:

- imported PVC; and
- imported caustic soda for resale by Australian Vinyls.

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Australian Vinyls has four businesses:

- resins (PVC);
- speciality products;
- caustic soda: and
- ModWood.

Australian Finyls has been operating on a July to June financial year since the change of twhership in 2002. It uses JD Edwards' One World Financial Schware (One World), an enterprise resource planning system, to record all production, costs, sales and accounting data. It uses a stand alone system to record payroll information.

Australian Vinyls advised it was unable to provide audited financial statements as it ceased producing audited financial reports in 2007 when it was acquired by CSBP. However, we were able to verify data to Manacol's consolidated income statement, which identified income and costs for each business. Australian Vinyls stated that this data is reflected in Wesfarmers audited financial statements.

Australian Vinyls uses standard costs which results in purchase price and efficiency variances. It accounts for variances monthly.

#### THE GOODS LIND LINE GOODS

### 4.7 The goods

The goods covered by the dumping duty notices are PVC.

PVC is a white free flowing powder that is used in combination with other chemicals to produce a variety of products. PVC is sold to a range of processors who either extrude, inject, mould or blow mould the PVC to make a wide variety of goods. The major end-use of PVC based products is in the building and construction sector (e.g. pipes and fittings, cables, house cladding, gutters, down pipes, flooding and window frames). PVC based products are also used in packaging, upholstery and domestic appliances.

The goods subject to the anti-dumping measures do not include FI/C compounds, pastes or emulsion grades.

#### Tariff classification

PVC is classified under sub-heading 3904.10.00, statistical code 18, in Schedule 3 to the Customs Tariff Act 1995. The rate of duty from the USA is free under the Australia-United States Free Trade Agreement. The rate of duty for PVC exported from Japan is 5%.

#### 4.2 Like goods

In previous investigations, inquiries and reviews in respect of PVC, Customs and Border Protection determined that Australian Vinyls was the Australian industry producing like goods. On the basis of information provided by Australian Vinyls during this visit and previous visits, Customs and Border Protection considers Australian Vinyls is a producer of like goods.

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# 5 THE AUSTRALIAN (NOUSTRI)

### 5.1 Australian production

Australian Vinyls is the sole manufacturer of PVC in Australia. Its production facilities are in Laverton Morth, Victoria. The company manufactures PVC and wood-plastic compounds, as well as supplying a range of imported chemicals including caustic soda. PVC processing additives, synthetic rubbers and speciality elastomers.

The PI/D produced by Australian Vinyls includes:

| Grade       | Miratus | Major End Uss   |
|-------------|---------|---|
| 57R1        | 57.2    | Rigid fittings, pipe elbows, caps, joins and inner core foam core pipe. |
| 62R2        | 62      | Rigid extruded profiles.<br>non-pressure pipe                           |
| 66R1 & 66R2 | 66      | Rigid, pressure non-<br>pressure pipe, conduit,<br>profiles             |
| 67R1 & 67R2 | 67      | Rigid, pressure non-<br>pressure pipe, conduit,<br>profiles             |
| 67F1        | 67      | Flexible, electrical plugs, footwear, auto trims, flooring              |
| 71F1        | 71      | Flexible, insulation sheathing of cables, catering film. hose, footwear |

All PVC produced by Australian Vinyls is sold under the brand name "Corvic", technical data sheets for the above are at non-confidential attachment G-1.

# 5.2 PVC production process

PVC is a white free flowing powder that is used in combination with other chemicals to produce a variety of products.

The main input into the production of PVC is vinyl chloride monomer (VCM). VCM is manufactured by combining ethylene and chlorine to form ethylene dichloride that is cracked in a furnace. PVC is made in a batch process in which VCM droplets are

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|---|
| polymerised, while suspended in water, in the presence of an initiator and other 20 additives.  |
| Australian Vinyls advised that its strategy [Information on Australian Vinyls' production strategy]   |
| 5.3 Capacity, employment and annual turnover  |
| Australian Minyls stated that its Laverton Horth plant has the capacity to produce approximately 140,000 tonnes of PMO per annum depending on the mitt of PMO grades produced. The plant has two atreams that produce the training grades of PMO. |
| Australian Trinyls employs approximately people, of which about are employed in the production and sale of PVC.   |
| Australian Vinyls annual turnover is about million, of which about my relates to produced PVC and about my to PVC imported by Australian Vinyls Trading.  |
| All of Australian Vinyls PVC is sold on the Australian domestic market, no PVC is exported.   |
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### 6 PUSTRALIAN MARKET

#### Ga Market structure

The Australian market for PVC is supplied through local production and imports from a number of sources. Australian Vinyls imports PVC from Taiwan to supplement domestic production.

FVC is sold to a range of processors who either extrude, inject, mould or blow mould the PVC to make a wide variety of goods. The major and-use of FVO based products is in the building and construction sector (such as pipes and fittings, cables, house cladding, gutters, down pipes, flooring and window frames). PVC based products are also used in water supply piping, packaging, upholstery and domestic appliances.

#### 5.2 Market size and demand

During the recent continuation inquiry into PVC from the USA (Rep 174), Customs and Border Protection estimated the size of the market at slightly over 190,000 tonnes in the financial years 2009-10 and slightly below 190,000 tonnes in 2010-11. REP 174 showed the market peaking in 2007/08 at around 225,000 tonnes before declining in subsequent years.

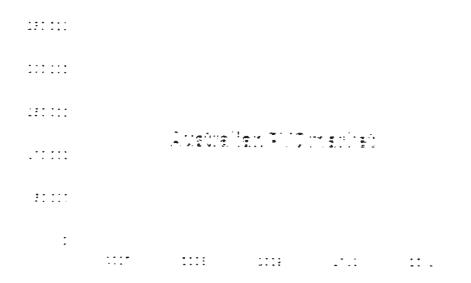
In its application Australian Vinyls estimated the size of the market in the calendar year 2011 at approximately 180,000 tonnes. Australian Vinyls estimated the current market was at 190,000 to 200,000 tonnes per annum.

Australian Vinyls said that it relies on monthly forecasts from its larger customers to estimate demand for the next three months, however these forecasts can be unreliable.

Australian Vinyls said the market is weaker due to the effects of the global financial crisis and the breaking of the drought and floods. During the drought there was demand for large water projects requiring irrigation pipe, however the floods reduced demand as there was no longer a need for those projects. In addition it also became impossible to lay pipes in the flooded areas. The global financial crisis had an effect due to the slowdown in the construction industry which uses PVC for pipes, cables flooring, profiles, ducting, window profiles and siding. Technology improvements, such as using thinner walled pipes, can also affect demand as less material is required, however this may make PVC more competitive as it lessens the cost.

Australian Vinyls was also affected in the first half of 2008 by a prolonged plant shutdown that meant its larger customers could not get PVC at a time when the economy was still booming.

Customs and Border Protection estimated the size of the Australian market for the calendar years 2007-2011 using information from its import database and information supplied by Australian Vinyls. The market declined from 2007 to 2009 before increasing to approximately 200,000 tonnes per annum in 2010 and 2011. Movements in the size of the Australian market are illustrated in the following chart.



#### 6.3 Distribution arrangements

Australian Vinyls said that PVC is stored in bulk silos at its Laverton facilities and also in tonnes shipped by rail and stored at leased sites in different states. The PVC can also be stored at its customers sites using the customers silos and sold on a consignment arrangement where the customer pays for the PVC it uses each month from the amounts held on the site.

Australian Vinyls also advised that PVC may be delivered direct to customers as bulk shipments using B-double trucks. Approximately \( \bigcirc \)% of its sales are bulk sales with other pack types being 25 kilogram bags comprising about \( \bigcirc \)% of sales and bulk bags of one tonne comprising about \( \bigcirc \)% of sales.

The Australian Vinyls produced Corvic brand is sold to all states, however when the market is strong PVC imported by Australian Vinyls is sold primarily in Queensland and Western Australia due to the high transport costs to sell Corvic there.

Australian Vinyls advised that its imported PVC is also stored on site around Australia, however the Corvic product takes priority over the imported product for sales.

# 6.4 Japanese imports

In its application Australia Vinyls noted that it was only able to identify imports from Japan in 2010 and 2011 due to restrictions on the country of origin being in force on published data.

Australian Vinyls said during the visit that PVC production in Japan had been affected in 2011 by the tsunami in March 2011 and the closure of a VCM plant in October 2011 due to an accident. (TOSOH's three VCM lines were shutdown in November 2011, with two scheduled to recommence production in May 2012).

Dustoms and Bords: Protection noted in its Consideration Report (OOH 184) for this Inquiry that exports of PVC from Japan to Australia have maintained a presence in the market, albeit at declining volumes, since the last continuation inquiry.

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#### 7.i latreduction

Australian Vinyls provided monthly sales of domestically produced PVC in its cost to make and sell spreadsheet. It separately provided monthly sales of imported PVC. Prior to the visit, Australian Vinyls provided a sales ledger report with a line by line sales listing for the period October 2010 to December 2011. Australian Vinyls explained that it separately reported sales of locally produced FVC (company 10) and imported FVC (company 90).

#### 7.4.4 Reconciliation

We reconciled the sales data between the Appendix A 6 for domestically produced PVC, the imports appendix and Appendix A 4 for all sales for 2011. There was a minor variance on sales revenue (-0.9%) for domestically produced PVC and minor variances on revenue (1.4%) and volumes (0.5%) for imported PVC between the appendices.

This reconciliation is at confidential attachment sales 1

#### 7.1.2 Pricing

Australian Vinyls explained that it negotiated prices with major customers monthly and formalised these prices in a price letter to the customer.

Australian Vinyls said that the pricing is based on [commercially sensitive pricing details]. The port and unloading charges in Australia and storage and distribution costs.

Australian Vinyls advised that volumes had an effect on pricing [commercially sensitive pricing details]. PVC imported by Australian Vinyls was sold at the same price to its customers as its produced PVC.

#### 7.1.3 Rebates and discounts

Australian Vinyls said that rebates are offered to keep prices to individual customers confidential, rebates [purpose].

Australian Vinyls [commercially sensitive pricing details] were price and volume rebates. Others included rebates for accuracy in forecasting PVC requirements, market development and for PVC used in goods for export. The value of rebates varied from customer to customer.

Australian Vinyls advised that rebates were recorded in the sales ledger in the same month that the goods subject to the rebate were sold. However, it explained that one customer, also received additional rebates that were [details of additional rebates].

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#### Table - Selling and alebitoution

Australian Vinyls stated that its largest customers were and fig. These customers have several locations around Australia. Australian Vinyls explained that its price to these customers was the same regardless of the location and source of the PVC, locally produced or imported. However Australian Vinyls said that it did incur additional freight costs depending on where the goods were delivered. As a result, Australian Vinyls explained that it was most advantageous for it to sell domestically produced FVO to New South Wales, South Australia and Victoria and imported FVO to Western Australia and Queensland. However, Australian Vinyls explained that it was only able to do this when the market was large enough and it could sell all of its production in the southern states.

Australian Vinyls stated that it processes orders in two ways:

- correctives the order by phone which is entered directly into One World; and
- according to a monthly delivery schedule one order is raised for the month and delivered according to the delivery schedule.

Australian Vinyls stated that over \( \bigsige \)% of its sales are by consignment, the PVC is stored in silos at the customer's site and Australian Vinyls invoices the customer according to the amount of PVC used each month. The sale of PVC is booked as a sale and invoiced to the customer when the PVC is used, not when the PVC is delivered.

#### 7.2 Verification of domestic sales

#### 7.2.1 Verification to financial accounts (completeness)

As noted above, Australian Vinyl's accounts are not audited. However, we were able to verify data to Manacol's, consolidated income statement.

#### 7.2.2 Sales of domestically produced PVC

Australian Vinyls provided Manacol's consolidated income statements for the months ended June 2011 and December 2011, the 12 months ended June 2011 and the six months ended December 2011. These documents are at **confidential attachment** sales 2.

Sales revenue and rebates are reported in Manacol as separate items, the A 4 appendices provided separate details on revenue and rebates whilst the A 6 appendix provides revenue net of rebates.

Whilst the revenues net of rebates reconciled to the A 6 with a minor discrepancy (0.002%) the rebates on the A 4 listing did not reconcile to the Manacol statement.

Australian Vinyls explained that this discrepancy was due to the additional rebates [details of additional rebates].

Australian Vinyls provided the June 2011 GMargin report, the sales ledger report listing the rebates and a listing of journal entries for that month. The rebates in the sales ledger report reconciled to the listing in the A 4, whilst the rebates inclusive of

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journal entries reconciled to the Manacol statement for June 1011. We are therefore satisfied that the \_\_\_\_ additional rebates were the bause of the discrepancy. The net sales and volumes in the GMargin report reconciled to the A.5 data. Documents relating to the rebates and reconciliation are at <u>confidential attachment sales 3.</u>

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#### 7.2.3 Sales of Imported PVC

### 7.2.4 Verification to source documents (relevance and accuracy)

We selected eight sales transactions for verification from the A 4 sales listing and two associated rebate transactions. Australian Vinyls provided copies of sales and rebate invoices, proof of payment and pricing offers and formulae for the selected transactions. We were able to reconcile the documents to the listings and the pricing offers to the prices on the invoices. These documents are at **confidential** attachment sales 4.

#### 7.3 Conclusion

We have verified the sales data provided in the application. We are satisfied the data is complete, accurate and reliable and sales of domestically produced PVC can be clearly identified from sales of imported PVC.

| 6              | MARORIS  | . [ |
|----------------|--|-----|
| Sale:<br>Vinyl | ralian Vinyls imports PVC via AVC Trading to supplement domestic production, so of domestic production and imports are separately recorded in Australian si sales ledger. Price agreements with Australian Vinyls' customers are for regardless of whether it is domestic production or imports. |     |
| deliv<br>Cego  | ralian /inyls currently purchases it PVC requirements from The say terms are and the payment terms are AVC Trading states the price of PVC on a shipment by shipment basis. The regotiation is set by the prices and other industry bulletins.   |     |
| Aust           | ration Vinvis imports and sells the Formoss PVC in bulk containers, bulk bags  |     |

Australian Vinyls provided supporting documentation for four selected shipments, these documents are at confidential attachment imports i. As noted above. Australian Vinyls does not distinguish between domestic production and imports in its sales process and in determining the profitability of the selected shipments it used selling prices and selling, general & administrative (SG&A) expenses from its cost to make and sell spreadsheet. Australian Vinyls provided monthly costings and profitability assessments of its imported PVC that showed overall the imported PVC was profitable for 2011.

and 25 kilogram bags.

We explained to Australian Vinyls that we needed to be satisfied that the data submitted in the application was complete, relevant and accurate. The company would have to demonstrate that the data could be verified and traced to financial statements and to source documents.

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We did not refify production volumes as all posts are calculated using sales volumes.

#### 8.2 Verification of cost to make

#### 3.2.1 Variable manufacturing costs

Variable manufacturing costs comprise raw materials and direct labour. The cost of imported raw materials is identified in appendix A6. The various components of this cost are identified in a variable costs tab. The major component is the landed cost of VCM. Australian Vinyls stated that the price of VCM is based on [commercially sensitive purchase details].

We sought to verify the landed cost of VCM of to December 2011, which accounted for about \% of the cost to make.

Australian Vinyls uses standard costs. The VCM landed cost has two components, the standard cost and the purchase price variance (PPV). The standard cost is calculated as follows:

- sales tonnes, excluding floor sweepings (total sales of tonnes less floor sweepings of tonnes verified to the December sales listing report);
- multiplied by the standard cost (\$ (\$);
- o multiplied by (tonnes of VCM required to make one tonne of PVC) to give the standard cost component of (make one tonne of PVC) to

Documents relating to the standard costs for VCM are at confidential attachment costs 1.

A PPV is calculated for each shipment. The PPV for each month is the PPV in stock on hand at the end of the previous month plus the PPV for shipments during the month less the PPV on hand at the end of the month. Australian Vinyls provided a VCM PPV tracking spreadsheet (tracking spreadsheet) identifying shipments to the end of December 2011 and the PPV in stock on hand at the end of December (confidential attachment costs 2).

Australian Vinyls provided stock reports to verify stock holdings for the end of December for:

- all PVC stocks, including consignment stock, plus stock held for a particular customer, plus goods shipped but not invoiced (\*\* tonnes);
- multiplied by to represent VCM component (tonnes);

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- 7/Oivi atoolt held at the territinal;
- '/OM held in tanks at Laverton; and
- /CM stock in transit.

Documents for stock heldings are at confidential attachment costs 3.

The PFI for I/DM for December is calculated as the difference of the closing balance of the PPV less PPV in stock. The PPV variance of \$[1.50] for December 2011 is in the income statement for Managol.

We then sought to verify costs for shipment 20149 in the tracking spreadsheet. This spreadsheet records:

- connes into terminal:
- the standard cost of VCM for the shipment, based on terms into terminal;
- total PPV for the shipment;
- an adjustment reflecting the difference between the standard cost and the amount paid to the supplier;
- c ocean freight:
- clearing charges; and
- o an adjustment reflecting the difference between the invoiced amount from the bill of lading and the tonnes into terminal, based on the standard cost of VCM in tanks at the terminal (Australian Vinyls stated that unless the quantity varies by more than []%, it pays on the bill of lading quantity, not tonnes into terminal).

Australian Vinyls provided supplier invoices and bank statements supporting the purchase cost and freight cost for the VCM (confidential attachment costs 4). We verified the VCM and freight costs from the supplier invoices and to bank statements, there was a minor variance on the VCM cost of 0.02%.

We are satisfied that the raw material costs in the cost to make and sell spreadsheet reflect the actual raw material costs for the resins business in Manacol's consolidated income statement.

#### 9.2.2 Fixed costs and selling and distribution expenses

Australian Vinyls advised that during previous investigations, Customs and Border Protection stated that costs should be recorded in the cost to make and sell spreadsheet in the format required by Customs and Border Protection, even though the company does not record costs in that format.

To complete the cost to make and sell spreadsheet Australian Vinyls runs a separate cost centre report identifying the total labour and non-labour costs in each fixed cost centre. A separate wages and salaries report is then run for each cost centre to identify the labour component. Australian Vinyls uses these reports to then:

#### 医乳蛋性硷 医唇纹毛皮病

- allocate a proportion of labour and non-labour posts from each post sentre to the resins business;
- further allocate costs to the cost to make, with the balance being allocated to SG&A expenses;
- allocate non-labour cost to make expenses to either variable or fixed costs;
- allocate labour cost to make expenses to direct labour costs; and
- allocates labour and non-labour SG&A costs to either selling or administrative expenses.

| For example, purchasing and logistic costs as % of these posts are allocated to the | ra nacorded in cost cantres 🔙 and      |
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| in billion base of these costs are allocated to the                                 | ie resine business. "Lustralian Vinyts |
| advised that the allocation percentages were de-                                    | stermined some years ago.              |

Australian Vinyls provided a report by cost centre for the month and year to date ended December 2011, costs centres not associated with resins, such as livid wood and AVC Trading are identified in a summary analysis report. The total of the reports reconciled to the business unit fixed costs on the Manacol income statement for December 2011. These reports are at confidential attachment costs 5.

Australian Vinyls also provided a separate wages and salaries report for December 2011 that reconciled to the Manacol statement, this report is at confidential attachment costs 6.

The reports reconciled to the spreadsheets provided with the CTMS appendices and were used to allocate the labour and fixed costs to variable overheads, fixed overheads and selling and administration costs.

We are satisfied that the fixed costs in the cost to make and sell spreadsheet reflect the actual fixed costs for the resins business in Manacol's consolidated income statement.

#### 9.2.3 Other costs

Depreciation charges, recorded in fixed manufacturing charges, and transport charges, recorded in selling expenses, were taken from the resins component of Manacol's consolidated income statement.

#### 9.2.4 Verification to financial accounts

Australian Vinyls provided a reconciliation to trading profit spreadsheet from A 6 to Manacol accounts as part of the appendices. We were also able to separately reconcile the material, manufacturing and transport costs of million in the A 6 to the net revenue less gross margin in the Manacol income statement of million. The labour and fixed costs reconciled to the Manacol income statement as noted previously.

#### 9.3 Conclusion

We have verified the cost data provided in Appendix A6. We are satisfied the data is complete, accurate and reliable and only includes costs in respect of domestic sales of like goods.

# TO EPONOMIC CONDITION OF THE MEWSTER

Australian Vinyls provided data until December 2011. The following analysis examines trends in respect of sales of local production and imports where noted, on a calendar year basis.

#### 19.1 Valume effects

Movements in sales volumes are litustrated in the following that:

i di kan ningmaa

As noted previously, Australian Vinyls advised that its strategy [information on Australian Vinyls' production strategy].

The lower sales volume in 2008 is attributable to a plant shutdown in March 2008. The shutdown was required to allow the installation of a new distributed control system. Sales volumes since 2008 have been steady and at the levels approaching maximum output.

Australian Vinyls sales of imported PVC rose in 2008 to help offset the shortage caused by the plant shut down but have been declining since then.

As Australian Vinyls has been producing close to optimum capacity market share would not appear to be not an injury factor relevant to this inquiry.

Australian Vinyls has also managed to sell all of its production though stock levels have risen in 2011 as noted further in this section.

#### 10.2 Price effects

Price depression occurs when a company, for some reason, lowers its prices.

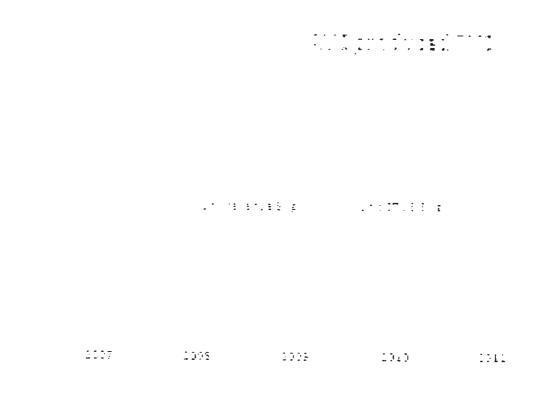
# FUELD FEGIFE

Frice suppression occurs when price increases for the applicant's product, which otherwise would have occurred, have been prevented.

63

An indicator of price suppression may be the margin between revenues and costs.

Movements in unit revenues and costs are illustrated in the following chart.



Australian Vinyl's average price was relatively steady from 2007 to 2008 before declining in 2009 following the global financial crisis, prices have been steady since then. Prices have been depressed being lower from 2009 to 2011 than they were in 2007 and 2008.

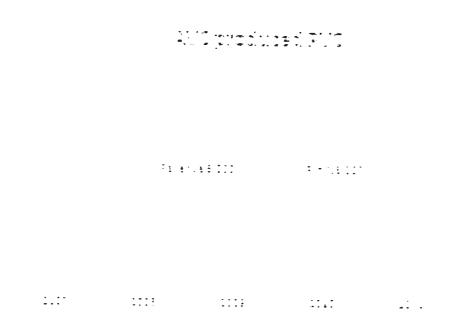
Movements in both total and unit revenue and costs indicate that costs exceeded prices from 2008 to 2011.

The negative margin between revenue and costs has been increasing since 2008 indicating that prices have been suppressed.

# FUELD RECOED

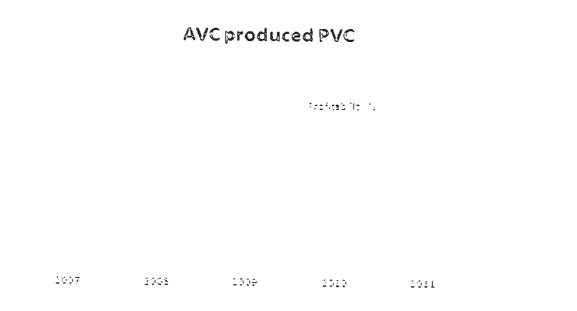
# 1924 - Especias, positi and profitability effects

Movements in revenue and total profits are illustrated in the following chart.



Revenue fell significantly in 2008, this was mainly due to the plant shutdown in March 2008. Revenues increased from 2008 as production came back on line. Total profits have been steadily decreasing since 2007.

Profitability is profit expressed as a percentage of revenue.



Profitability sharply decreased from 2007 to 2008 and has been on a steep decline since.

# Mad Scattering of major injury indicators

61

Injury factors indicate that the economic performance of the Australian industry has deteriorated from 2007 to 2011. Profits and profitability have increasingly declined from 2007 as costs rose above prices. Revenues have shown some decline whilst volumes appear to reflect the plant is running at capacity.

We consider that the decline in profits, profitability and the price suppression evident as costs have risen above prices indicates that Australian Vinyle is susceptible to further injury should the Australian PVO market deteriorate further or if other market pressures emerge.

#### 10.5 Other injury indicators

Australian Vinyls provided an updated appendix A 7 summarising other injury indicators from 2009 to 2011.

Of these factors return on investment shows a decline from 2009 to 2011, revenues have decreased as noted and stock holdings after declining in 2010 have increased in 2011.

Data relating to the analysis of the economic condition of Australian Vinyls is at confidential appendix 1.

# NO MALL EQUARING AND MATERIAL MUVEN BOURNING OF RECUR

#### 11.1 Will dumping continue or recur

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Dustoms and Border Protection's import database indicates that there were low volumes of imports of PVO from Japan since 2007.

in its application, Australian Minyls highlighted that Japan is the world's second largest producer of PVC globally and over 2011 its production utilization rate was only 71%, which suggests considerable excess capacity. Australian Vinyls also provided data on New Zealand imports. Australian Vinyls highlighted that PVC import volumes from Japan increased by 54% over 2011 on the previous year to demonstrate Japan's exporters are capable of increasing volumes to capitalise on opportunities for supply.

In its application Australian Vinyls also suggested that the publication, Harriman Chemsult, in December 2011 indicated that Japanese exporters are seeking markets due to sluggish domestic demand. Japanese production of VCM and PVC has been severely disrupted by two recent events: the earthquake and subsequent tsunami early in 2011 and the fire and explosion at the TOSOH complex in Nanyo in September 2011. Production at the No 1 and No 3 plants is expected to resume in 2012 increasing availability for an expansion of PVC production and exports.

Australian Vinyls said at the visit that PVC production in Japan had been affected by the tsunami in March 2011 and the closure of a VCM plant in October 2011, however Japan was still the largest producer in the Asia region and exported 300,000 - 400,000 tonnes per month.

#### 11.1.2 Will dumping continue or recur

In its application, Australian Vinyls provided Harriman Chemsult data on domestic and export prices in Japan for 2011 and New Zealand import statistics on PVC from Japan for 2011. Australian Vinyls calculated monthly dumping margins for 2011 for PVC imported into New Zealand from Japan; the margins ranged from 32 – 91%.

Australian Vinyls claims were assessed in Consideration Report 184 (Con 184) which noted given the margins calculated it is reasonable to conclude that exports (from Japan to New Zealand) were at dumped prices.

Australian Vinyls said that prices in the Asia region were low due to the presence of low priced exports from the USA. The USA producers were looking for new markets to sell into as the USA domestic market had very little demand, the prices of the USA exports were affecting pricing of other exporters, including Japan in the region. This situation made it more likely that exports from Japan would be lower priced and more likely to be dumped.

#### 医侧隔凹的 医腊伯德氏质

Australian Virgls considers that with the resumption of CON production at the TOSOH Line 1 and 3 facilities, there will likely be an increase in Japanese PVQ export volumes - particularly given the slow domestic demand in Japan.

### 'All material injury continue or recur

In its application Australian Vinyls claimed that its financial position in 2012 was precarious with domestic selling prices declining, price suppression being experienced and profit and profitability deteriorating. Australian Vinyls asserted in the application that the prices of PVC exported from Japan to New Zealand in 2019 if suportied to Australia and after adding posts to approximate a true store price mould have undercut its average selling price that would likely have caused it to respond by lowering its prices resulting in additional injury.

We noted that Australian Vinyls profitability was positive in 2007 but has been declining since then. The volume of imports from Japan over this period was minor and we asked Australian Vinyls to explain these results in a period where antidumping measures applied to PVC from the USA.

Australian Vinyls explained that three years ago it installed new software that did not work very well and this lead to shortages in the market when it had to shutdown the plant in March 2008. Australian Vinyls claimed it would have made a profit if it were not for this problem.

Australian Vinyls said that the global financial crisis also affected the market and that in 2009/10 dumped exports from the USA and other countries to the Asia region affected prices in that region which had a flow on effect to Australia Vinyls pricing.

Australian Vinyls explained that PVC was a commodity product and the price in Australia was influenced by global factors. The price in Australia was particularly influenced by the price of PVC in Asia, as listed in industry publications such as Harriman Chemsult. The publications meant that prices in the market were quite transparent. Australian Vinyls stated that the influence of the USA on these prices was critical. Australian Vinyls provided Harriman Chemsult reports for June, July and December 2011 discussing the PVC market, these documents are at confidential attachment ini i.

Australian Vinyls also provided a graph on PVC prices and profits in East China in 2011 that showed PVC was being sold unprofitably since May 2011 and thus demonstrated the pricing pressures on PVC in the region. This graph is at confidential attachment ini 2.

Australian Vinyls said that in 2011 its results had been affected by imports from Korea that it alleged were at dumped prices and injurious.

Australian Vinyls also said that from 2008 its major customers, [ iii], had been a formula driven price based on . However from and started taking Korean imports and asking Australian Vinyls to match the import prices.

### BUELLS PERCE

Australian Thij's believed that Horean exports had been displaced from their traditional markets by the low priced USA exports and that (forean exporters were seeking new markets in Australia.

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Australian Vinyls said that Korean imports into Australia were subject to the general 5% duty and would need to be dumped to compete with exports from Thailand which were not subject to the 5% duty.

### PURMO PERCE

# . IN ISUFFFESSED SELLING FROE

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Customs and Border Protection generally derives the non-injurious price<sup>2</sup> by first establishing a price at which the applicant might reasonably sell its product in a market unaffected by dumping. This price is referred to as the unsuppressed selling price (USP). Having calculated the unsuppressed selling price, Customs and Border Protection then calculates a non-injurious price by deducting the costs incurred in getting the goods from the export FOB point (or another point if appropriate) to the relevant level of trade in Australia. The deductions normally include overseas freight, insurance, into-store costs and amounts for importer expenses and profit.

This inquiry is not reviewing any of the variable factors (the normal value and the non-injurious price), however a review of the measures applying to Japan and the USA was initiated following consideration of an application from Chemipias.

We noted that in its application Australian Vinyls had calculated a USF based on its OTMS plus a level of profit achieved in 2006 and asked why profits or selling prices from later years should not be considered.

Australian Vinyls said that its prices from 2008 had been affected by other factors such as construction demand and the drought and floods as noted at sections 6.2 and 11.2. Australian Vinyls also did not consider the prices of other imports in the market as an appropriate reference as these prices would have been affected by the allegedly dumped imports from Korea.

Australian Vinyls said that a USP based on CTMS plus the level of profit it achieved in 2007 may be appropriate, however it also said that this profit had been distorted by a large one off impairment item in June 2007 that needed to be taken into account.

Australian Vinyls said that it would provide further details on this item.

<sup>&</sup>lt;sup>2</sup> The current measures have been in place since 1992 and the legislation at that time referred to the non-injurious FOB price. Any reference to the non-injurious price includes reference to the non-injurious FOB price.

# 13 BENEFIL POMMENTS

Australian Vinyls stated that it had experienced difficulties with falling demand in the domestic market over the period since 2008. The end of the drought across Eastern Australia prompted the government to terminate plans to use PVC piping to pipe water across the country to major capital cities to ease concerns over water security. In addition, heavy flooding across the Eastern seaboard had prevented the laying of PVC pipes.

Australian Lingle also pointed to falling demand for PMD from the housing construction market across Mictoria, Hew South Maies and Queensland for deteriorating market conditions.

Australian Vinyls highlighted PVC pips product development which is being angineered to become more light weight resulting in a reduction in volumes of PVC resin used in pipe production as a further factor which is suppressing demand.

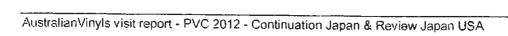
Australian Vinyls commented that due to the falling domestic demand the volume of imported product it imports to supplement supply has decreased. In the past Australian Vinyls had the option of reducing import volumes should overall demand decrease, however this buffer is no longer an available option.

Australian Vinyls highlighted that it has undertaken product development to meet customers' (Armstrong Industries) expectations to create a green star compliant PVC resin for use in green star buildings. Australian Vinyls also noted that it had developed a locally produced grade of PVC in conjunction with Armstrong Industries to replace the imported PVC it used to use.

Australian Vinyls stated green star compliant products are currently not available through imported sources.

# NA ATTROFICE ITS AND APPENDED

| Non-confidential attachment G-1   | Technical data sheets Corvic PVC               |
|-----------------------------------|--|
| Confidential Appendix 1           | Data for Australian Vinyls aconomic condition  |
| Confidential attachment sales 1   | Reconciliation of sales of domestic production |
| Confidential attachment sales 2   | Manacol statements                             |
| Conficiential attachment cales 3  | Rebates  |
| Confidential attachment calco 4   | Selected sales and rebates transactions        |
| Confidential attachment imports 1 | . Salected import documents                    |
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| Confidential attachment code 2    | VOM FPV tracking sheet                         |
| Confidential attachment costs 3   | Stock reports                                  |
| Confidential attachment costs 4   | VCM and shipping involces and payments         |
| Confidential attachment costs 5   | Cost centres reports                           |
| Confidential attachment costs 6   | Wages and salaries                             |
| Confidential attachment Inj 'i    | PVC market reports                             |
| Confidential attachment inj 2     | PVC prices and profits East China 2011         |



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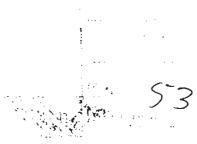
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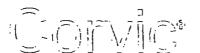
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