



GM Holden Ltd

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10 July 2015

Anti-Dumping Commission
GPO Box 9839
Canberra City. ACT 2601

Attention Director, Operations 2
Mr Roman Maevsky

By email: operations2@adcommission.gov.au

Importer Questionnaire

Dear Roman,

Anti-Circumvention Inquiries Number 290 and 298 – Zinc Coated (Galvanised) Steel Exported From The People's Republic Of China, The Republic of Korea And Taiwan.

We refer to the subject inquiries and provide the following responses.

1.1. Identity and communication

1.1.1. Company contact

Name: Mr Alex Menta
Position in the company: Regional Customs Manager
Address: 191 Salmon Street, Port Melbourne. VIC 3207
Telephone: 03 96477550 (mobile [REDACTED])
E-mail address of contact person: alex.menta@gm.com

1.1.2. Company information

What is the legal name of your business? What kind of entity is it (e.g. company, partnership, sole trader)? Please provide details of any other business names that you use to import goods.

GM Holden Ltd (GMH) is a proprietary Australian Company. Its parent company is General Motors Company, based in Detroit, Michigan, USA



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Describe the nature of your company's business. For example, state if you are a distributor, wholesaler, retailer, end user).

GM Holden Ltd is a motor vehicle manufacturer. The galvanised steel that is imported is used in the manufacture of vehicles, therefore GMH's role in the Australian market is that of importer/end-user. GMH does not on sell the imported product.

1.2. Imports to Australia

1.2.1. Description

Fully describe all non-alloy galvanised steel and alloyed galvanised steel you have imported from Korea, Taiwan and China during the inquiry period.

GMH has imported both non-alloy galvanised steel and alloy galvanised steel during the inquiry period.

From China, the goods imported included Hot dipped galvanised, Zinc and Galvanneal coated, exposed and unexposed both non-alloy and alloy steels.

From Korea, the goods imported included Zinc coated, exposed and unexposed both non-alloy and alloy steels.

A full listing is provided in attachment 1.

1.2.2. Exporter identity

For each exporter in Korea, Taiwan and China from whom you imported the non-alloy galvanised steel and alloyed galvanised steel in the inquiry period list:

China

- Name; [REDACTED]
- Address; [REDACTED]
- Contact name : [REDACTED]
- Phone/fax number; [REDACTED]
- Nature of business: [REDACTED]
- Supplied: [REDACTED] [supplier details] have supplied both non-alloy galvanised steel and alloyed galvanised steel.

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Korea

- Name; [REDACTED]
- Address; [REDACTED]
[REDACTED]
- Contact name: [REDACTED]
- Phone; [REDACTED]
- Nature of business: [REDACTED]
- Supplied: [REDACTED] [supplier details] have supplied both non-alloy galvanised steel and alloyed galvanised steel..

1.3. Importation questions

1.3.1. Import data

GMH has attached a full listing of its imported Zinc Coated Galvanised steel (both non-alloy and alloy) for the period under review. The Product listing (attachment 1) details the relevant contract numbers, tariff classification and respective tariff concession where applicable. The Anti-Dumping Commission can select any product from this list and we would be most happy to provide all the relevant data during any site visit for validation purposes.

1.3.2. Import documents

Attached are complete import files

- two shipments of the alloyed galvanised steel; and
- two shipments of non-alloy galvanised steel

1.3.3. Ordering process

- a) Fully describe the ordering and purchase process from your overseas suppliers of alloyed galvanised steel from market offer through to invoicing, delivery and payment.

It is important to note GMH is neither a distributor nor retailer of Galvanised Steel which purchases Galvanised Steel to meet perceived consumer demand. Rather, we are a significant Australian OEM of motor vehicles and the purchase of Galvanised Steel forms a vital element of that manufacture.

Preliminary decisions on production and the purchase of all components (including Galvanised Steel) are taken around 2 years before production commences following research and development and design of all components needed for production.

Final decisions as to the sourcing and purchase of components such as the Galvanised Steel are based on price, the ability to meet demand and quality.

Pricing for components is set significantly in advance of delivery.

1.4. Australian sales

1.4.1. End use

- a) After importing alloyed galvanised steel, explain the subsequent sales channel/use of the product. For example, do you on-sell the products to other Australian entities for their use (or further on-sale), or do you consume the goods in the manufacture of products by your company?

As explained above, GMH uses the imported alloy galvanised steel in its manufacturing of vehicles and does not resell.

- b) In general, are there any specific purpose(s) and/or end use(s) that alloyed galvanised steel you import is suitable for that non-alloy galvanised steel is not suitable for? Provide specific product details and supporting evidence where possible

Yes, depending on the use within the vehicle and desired weight, strength, formability and other desired qualities.

- c) Are there any purpose(s) and/or end use(s) that non-alloy galvanised steel and alloyed galvanised steel can be used interchangeably for?

Yes. From an automotive industry view, if you can use non-alloy rather than alloy it is preferred purely from a cost perspective.

- d) If you use alloyed galvanised steel for the production of other goods by your company:

As stated previously, the imported steel is used in the manufacture of motor vehicles.

- e) If your company on-sells alloyed galvanised steel to other parties:

GMH does not on-sell and is the end user.

1.4.2. Selling price

This section is not applicable as GMH does not resell its imported non-alloy and alloy galvanised steel.

1.4.3. General sales questions

This section is not applicable as GMH does not resell.

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In terms of Galvanised Steel, prices are based on prices driven by global supply and demand

The Anti-Dumping Commission should be aware that any decision to change suppliers takes approximately a 2 year period.

The arrangements described above are set in place well in advance of the production and delivery of the Galvanised Steel. In the majority of instances, the commissioning and ordering takes place 2 years prior to delivery.

- b) Does the process described above differ in any way from the ordering and purchase process of non-alloy galvanised steel?

No

- c) Are the models of alloyed galvanised steel that you imported to Australia during the inquiry period part of your suppliers' standard product offering to Australia, or are they only available under special circumstances (e.g. through special order)?

The particular grades of alloy galvanised steel which we purchase are part of the mills standard production capabilities. As mentioned above, the use of these steels is vital to GMH's production of vehicles.

- d) Do you specifically request/order the goods to include alloys that result in it being considered alloyed galvanised steel?

The use of alloys in the manufacture of vehicles and automotive components is generally dictated based on the particular use in the vehicle. The requirement may be for deep drawing formability purposes, tensile strength, elongation etc.

1.3.4. Purchase price

- a) Is there a difference in purchase price from your suppliers between non-alloy galvanised steel and alloyed galvanised steel, assuming all other factors of the sale were the same (e.g. order quantity, product characteristics such as steel grade, coating mass, thickness, credit terms).

Yes

- b) If the answer to the above is yes, quantify the price difference for each year of the inquiry period. Provide any documents that support this price difference (e.g. price lists, comparable invoices, etc).

The price differences are generally driven by the additional elements that cause the steel to be considered an alloy. Certain elements give rise to greater price differential, but it should be noted that additional process cost are also incurred for the inclusion of such elements.

1.3.5. 'Switch' of imports

This section is not applicable as GMH has not altered its use nor of non-alloy and alloy galvanised steel.

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1.5. Open comments

GMH has not participated in any Anti-Circumvention activity. The purchasing of non-alloy galvanised steel and alloy galvanised steel has not altered nor differs from what was explained in the original Dumping inquiries .The use of alloy galvanised steel in the automotive industry would be considered as legitimate and highly specialised and would not be driven by any circumvention concepts. This is a view that is supported by Bluescope and evidenced by the record of minutes as placed on the public record. We wish to emphasise, that the alloy galvanised products imported by GMH are goods that are covered by tariff concession. The existence of these concessions also supports the claim of legitimate and highly specialised goods for automotive use.

GMH would welcome a site visit for the purposes of validating any information supplied in relation to this inquiry.

Importers Declaration



I hereby declare that GM Holden Ltd have completed the importer questionnaire and, having made due inquiry, certify that the information contained in this submission is complete and correct to the best of my knowledge and belief.

Name Alex Menta

Signature

Position in Company: Regional Customs Manager

Public Record

Appendix 1

Full Product listing and contract information