



Australian Government
Department of Industry,
Innovation and Science

**Anti-Dumping
Commission**

CUSTOMS ACT 1901 - PART XVB

STATEMENT OF ESSENTIAL FACTS

NO. 411, 412 and 423

**REVIEW OF ANTI-DUMPING MEASURES APPLYING TO
STEEL REINFORCING BAR**

**EXPORTED FROM CHINA BY
JIANGSU SHAGANG GROUP CO., LTD.,
HUNAN VALIN XIANGTAN IRON & STEEL CO., LTD., AND
JIANGSU YONGGANG GROUP CO., LTD.**

October 2017

CONTENTS

CONTENTS.....2

ABBREVIATIONS3

1 SUMMARY4

1.1 INTRODUCTION4

1.2 LEGISLATIVE BACKGROUND4

1.3 PRELIMINARY FINDINGS5

1.4 PROPOSED RECOMMENDATIONS5

2 BACKGROUND6

2.2 APPLICATIONS AND INITIATION.....6

2.3 THE CURRENT MEASURES6

2.4 REVIEW PROCESS6

2.5 RESPONDING TO THIS SEF8

3 THE GOODS AND LIKE GOODS.....10

3.2 THE GOODS SUBJECT TO THE ANTI-DUMPING MEASURES10

3.3 TARIFF CLASSIFICATION.....10

4 EXPORT PRICE AND NORMAL VALUE11

4.2 FINDINGS11

4.3 EXPORTER QUESTIONNAIRES AND VERIFICATION11

4.4 EXPORT PRICE.....11

4.5 NORMAL VALUE.....20

4.6 CONSTRUCTED NORMAL VALUE21

4.7 DETERMINATION OF CONSTRUCTED NORMAL VALUES23

4.8 DUMPING MARGINS25

5 NON-INJURIOUS PRICE27

5.2 INTRODUCTION.....27

5.3 COMMISSION’S ASSESSMENT.....27

6 FINDINGS AND PROPOSED RECOMMENDATIONS28

6.2 FINDINGS28

6.3 PROPOSED RECOMMENDATIONS28

6.4 PROPOSED FORM OF DUTY28

7 LIST OF APPENDICES AND ATTACHMENTS29

ABBREVIATIONS

Abbreviation	Full title
the Act	<i>Customs Act 1901</i>
ADN	Anti-Dumping Notice
then Assistant Minister	then Assistant Minister for Science and Parliamentary Secretary to the Minister for Industry, Innovation and Science
China	the People's Republic of China
the Commission	the Anti-Dumping Commission
the Commissioner	the Commissioner of the Anti-Dumping Commission
CTMS	cost to make and sell
GOC	Government of China
the goods	the goods the subject of the application
Hunan Valin	Hunan Valin Xiangtan Iron & Steel Co., Ltd.
IDD	interim dumping duty
Investigation 300 or 'original investigation'	Anti-Dumping Investigation No. 300
NIP	non-injurious price
OCOT	ordinary course of trade
OneSteel	Liberty OneSteel Pty Ltd
original investigation period	1 July 2014 to 30 June 2015
the Parliamentary Secretary	the Assistant Minister for Industry, Innovation and Science and Parliamentary Secretary to the Minister for Industry, Innovation and Science
SEF	statement of essential facts
Shagang	Jiangsu Shagang Group Co., Ltd.
Yonggang	Jiangsu Yonggang Group Co., Ltd.

1 SUMMARY

1.1 Introduction

This statement of essential facts (SEF) sets out the facts on which the Commissioner of the Anti-Dumping Commission (the Commissioner) proposes to base his recommendations to the Assistant Minister for Industry, Innovation and Science and Parliamentary Secretary to the Minister for Industry, Innovation and Science (the Parliamentary Secretary)¹ in relation to these reviews of the anti-dumping measures applying to certain steel reinforcing bar (rebar) (also referred to as the goods)² exported to Australia from the People's Republic of China (China) by Jiangsu Shagang Group Co., Ltd. (Shagang), Hunan Valin Xiangtan iron & Steel Co., Ltd. (Hunan Valin), and Jiangsu Yonggang Group Co., Ltd. (Yonggang).

These three reviews are in response to separate applications lodged by Shagang, Hunan Valin, and Yonggang (together, the applicants).

Each application for review is based on a change in the variable factors³ relevant to the taking of the anti-dumping measures in relation to the applicant. The variable factors in relation to each of the reviews are the export price, normal value and non-injurious price (NIP).

Due to the common review period,⁴ and for administrative convenience, the SEFs for the three reviews are detailed in this one report.

1.2 Legislative background

Division 5 of Part XVB of the *Customs Act 1901* (the Act)⁵ sets out, among other things, the procedures to be followed by the Commissioner in dealing with an application for review of anti-dumping measures.

Division 5 empowers the Commissioner to reject or not reject an application for review of anti-dumping measures. If the Commissioner does not reject the application, he is required to publish a notice indicating that it is proposed to review the anti-dumping measures covered by the application.⁶

The Commissioner must, within 110 days after the publication of the notice or such longer period as the Parliamentary Secretary allows, place on the public record a

¹ 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 decision the Minister is the Parliamentary Secretary to the Minister for Industry, Innovation and Science.

² Refer to section 3.3 of this report for a full description of the goods.

³ Subsection 269T(4E) of the *Customs Act 1901*.

⁴ The review period for each review is 1 April 2016 to 31 March 2017.

⁵ All legislative references in this SEF are to the *Customs Act 1901*, unless otherwise specified.

⁶ Subsection 269ZC(4).

statement of the essential facts (this SEF) on which the Commissioner proposes to base his recommendation to the Parliamentary Secretary in relation to the review of anti-dumping measures.⁷

1.3 Preliminary findings

The Commissioner finds, in relation to exports of rebar to Australia from China by the applicants during the period 1 April 2016 to 31 March 2017 (the review period), that, for each review:

- the ascertained export price has changed;
- the ascertained normal value has changed; and
- due to the existence of a 'particular market situation' the Parliamentary Secretary is not required to have regard to the desirability of fixing a lesser rate of duty.

1.4 Proposed recommendations

The Commissioner proposes to recommend to the Parliamentary Secretary that the notices in respect of the goods have effect as if different variable factors (being the export price and normal value) had been ascertained in respect of Shagang, Hunan Valin and Yonggang.

⁷ Subsection 269ZD(1).

2 BACKGROUND

2.1 Applications and initiation

On 19 May 2017, the Commissioner gave public notice in Anti-Dumping Notice (ADN) No. 2017/68 of his decision to initiate a review of anti-dumping measures with respect to rebar exported to Australia from China by Shagang and Hunan Valin. The background relating to the initiation of these reviews is contained in Consideration Report Nos. 411 and 412.⁸

On 29 June 2017, the Commissioner gave public notice in ADN No. 2017/91 of his decision to initiate a review of anti-dumping measures with respect to rebar exported to Australia from China by Yonggang. The background relating to the initiation of this review is contained in Consideration Report No. 423.⁹

2.1.1 Previous investigations

Since 2014, the Commission has conducted numerous investigations, reviews and inquiries relating to rebar. Full details can be found on the Commission's electronic public record at www.adcommission.gov.au. The matters relevant to the applications are summarised below.

1 July 2015	The Commission initiated an investigation into the alleged dumping of rebar exported to Australia from China following an application by OneSteel Manufacturing Pty Ltd (Anti-Dumping Investigation No. 300).
16 April 2016	The then Assistant Minister for Science and Parliamentary Secretary to the Minister for Industry, Innovation and Science (then Assistant Minister) published a dumping duty notice applying to rebar exported to Australia from China – <i>Anti-Dumping Commission Report No. 300</i> refers. The dumping margin found for Hunan Valin was 15.2% and the dumping margin found for Yonggang was 11.7%. The dumping margin for uncooperative and all other exporters of 30.0% was applicable to Shagang.
12 December 2016	Following a review of the then Assistant Minister's decision by the Anti-Dumping Review Panel, the then Assistant Minister revoked his previous decision and substituted a new decision in the same terms except with different normal values in respect of Hunan Valin and Yonggang, resulting in a dumping margin for Hunan Valin of 12.3% and a dumping margin for Yonggang of 11.5%

2.2 The current measures

The current anti-dumping measures applying to the applicants are in the form of ad valorem duties, with the rates of 12.3 per cent applying to Hunan Valin and 11.5 per

⁸ CON 411 & 412 - [Public Record](#)

⁹ CON 423 – [Public Record](#)

cent applying to Yonggang. Shagang is subject to the 'all other exporters' rate of duty of 30.0 per cent.

2.3 Review process

If anti-dumping measures have been taken in respect of certain goods, an affected party may consider it appropriate to review those anti-dumping measures as they affect a particular exporter or exporters generally. Accordingly, the affected party may apply for,¹⁰ or the Parliamentary Secretary may request that the Commissioner conduct,¹¹ a review of those anti-dumping measures if one or more of the variable factors has changed.

The Parliamentary Secretary may initiate a review at any time. However, a review application must not be lodged earlier than 12 months after publication of the notice imposing the original anti-dumping measures or the publication of a notice declaring the outcome of the last review of the notice imposing the original anti-dumping measures.¹²

If an application for a review of anti-dumping measures is received and not rejected, within 110 days of the initiation of a review, or such longer time as the Parliamentary Secretary may allow, the Commissioner must place on the public record a SEF on which he proposes to base recommendations to the Parliamentary Secretary concerning the review of the anti-dumping measures.¹³ The Commissioner has up to 155 days, or such longer time as the Parliamentary Secretary may allow, to conduct a review and report to the Parliamentary Secretary on the review of the anti-dumping measures.¹⁴

As noted in ADN No. 2017/122, an extension of time was granted in relation to Reviews 411 (Shagang) and 412 (Hunan Valin) for 41 days on 30 August 2017, for the publication of this SEF and the Final Report. Following this extension of time, two further notices, ADN No. 2017/147 and ADN No. 2017/150, relating to two further extensions of time were published on the Commission's website. The second extension of time related to the complexity associated with the construction of an appropriate raw materials benchmark, while the third extension of time related to recent legislative amendments.

The *Customs Amendment (Anti-Dumping Measures) Act 2017*, which came into force on 31 October 2017, amended the Act, specifically the provisions concerning the determination of export prices in a review of anti-dumping measures under Division 5 of Part XVB of the Act. Under item 4 of Schedule 1 to the *Customs Amendment*

¹⁰ Subsection 269ZA(1).

¹¹ Subsection 269ZA(3).

¹² Subsection 269ZA(2)(a). At the time that the applications for review were made, the most recent notice declaring the outcome of a review of the dumping duty notice was published on 3 August 2015 (following REP 272 and 273).

¹³ Subsection 269ZD(1).

¹⁴ Subsection 269ZDA(1).

PUBLIC RECORD

(Anti-Dumping Measures) Act 2017, these amendments apply to current reviews, that is, reviews under Division 5 that were being undertaken immediately before the commencement of the Schedule but for which a declaration in accordance with subsection 269ZDB(1) of the Act had not been made at that time. The Commission therefore must consider the new provisions in the context of these reviews of measures (see section 5.3).

During the course of a review, the Commissioner will examine whether the variable factors have changed. Variable factors in these reviews are a reference to:

- the ascertained export price;
- the ascertained normal value; and
- the NIP.

For each review, in making recommendations in his final report to the Parliamentary Secretary, the Commissioner must have regard to:¹⁵

- the application for review of the anti-dumping measures;
- any submission relating generally to the review of the anti-dumping measures to which the Commissioner has had regard for the purpose of formulating the SEF;
- the SEF; and
- any submission made in response to the SEF that is received by the Commissioner within 20 days of it being placed on the public record.

The Commissioner may also have regard to any other matter the Commissioner considered to be relevant to the review.¹⁶

In his final report the Commissioner must make a recommendation to the Parliamentary Secretary that the notice:¹⁷

- remains unaltered; or
- has effect, in relation to a particular exporter or to exporters generally, as if different variable factors had been ascertained.

The Parliamentary Secretary must make a declaration within 30 days of receiving the report or, if the Parliamentary Secretary considers there are special circumstances that prevent the declaration being made within that period, such longer period as the Parliamentary Secretary considers appropriate¹⁸ that the notice:¹⁹

- remains unaltered; or
- has effect, in relation to a particular exporter or to exporters generally, as if different variable factors had been fixed relevant to the determination of duty.

¹⁵ Subsection 269ZDA(3)(a).

¹⁶ Subsection 269ZDA(3)(b).

¹⁷ Subsection 269ZDA(1)(a).

¹⁸ Subsection 269ZDB(1A).

¹⁹ Subsection 269ZDB(1)(a).

PUBLIC RECORD

The Parliamentary Secretary must give notice of the decision.²⁰

2.4 Responding to this SEF

This SEF sets out the essential facts on which the Commissioner proposes to base his recommendations to the Parliamentary Secretary. The SEF represents an important stage in the review as it informs interested parties of the facts established and allows them to make submissions in response to the SEF.

It is important to note that the SEF may not represent the final views of the Commissioner. The final report will recommend whether or not the notices should be varied, and the extent of any interim duties that are, or should be, payable.

Interested parties are invited to lodge written submissions in response to this SEF no later than the close of business on **10 January 2018**. The Commissioner is not obliged to have regard to any submission made in response to the SEF received after this date if to do so would, in the opinion of the Commissioner, prevent the timely preparation of the report to the Parliamentary Secretary.²¹

The Commissioner must report to the Parliamentary Secretary on or before **4 February 2018**.²²

Submissions should preferably be emailed to investigations2@adcommission.gov.au.

Alternatively, submissions may be posted to:

The Director – Investigations 2
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601
AUSTRALIA

Confidential submissions must be clearly marked accordingly and a non-confidential version of any submission is required for inclusion on the public record. A guide for making submissions is available on the Commission website at www.adcommission.gov.au.

The public record contains non-confidential submissions by interested parties, the non-confidential versions of the Commission's verification reports and other publicly available documents. The public record can be viewed [online](#).

Documents on the public record should be read in conjunction with this SEF.

²⁰ Subsection 269ZDB(1).

²¹ Subsection 269ZDA(4).

²² As 4 February 2018 falls on a Sunday, the effective date is the following business day, Monday 5 February 2018.

3 THE GOODS AND LIKE GOODS

3.1 The goods subject to the anti-dumping measures

The goods the subject of the investigation are:

Hot-rolled deformed steel reinforcing bar whether or not in coil form, commonly identified as rebar or debar, in various diameters up to and including 50 millimetres, containing indentations, ribs, grooves or other deformations produced during the rolling process.

The goods covered by this application include all steel reinforcing bar meeting the above description of the goods regardless of the particular grade or alloy content or coating.

Goods excluded from this application are plain round bar, stainless steel and reinforcing mesh.

3.2 Tariff classification

At the initiation of the original investigation, Anti-Dumping Notice No. 2015/82 stated that the goods are typically classified to the following tariff subheadings in Schedule 3 to the *Customs Tariff Act 1995*:

- 7214.20.00 with statistical code 47;
- 7228.30.90 with statistical code 49 (as of 1 July 2015, statistical code 40);
- 7213.10.00 with statistical code 42;
- 7227.90.10 with statistical code 69; or
- 7227.90.90 with statistical codes 02 and 04.

Subsequent to the initiation of this investigation, the Commission found that the goods have been imported under the following additional tariff subheadings:

- 7227.90.90 with statistical code 42 (prior to 1 January 2015);
- 7227.90.90 with statistical code 01;
- 7228.30.10 with statistical code 70; or
- 7228.60.10 with statistical code 72.

The additional tariff classifications do not alter the goods description.

Further information on the goods and like goods is available at Document No. 035 on the [public record](#).

4 EXPORT PRICE AND NORMAL VALUE

4.1 Findings

The Commission has found, in respect of exports of rebar to Australia from China by the applicants, that:

- the ascertained export price has changed; and
- the ascertained normal value has changed.

4.2 Exporter questionnaires and verification

For each review, the Commission provided the applicant with an exporter questionnaire to complete. Each applicant provided detailed information and data in its response to the exporter questionnaire (REQ), including data relating to domestic sales and details of the cost to make and sell (CTMS). Each applicant provided additional information when requested by the Commission.

The Commission conducted an on-site verification of the information provided in Shagang's and Hunan Valin's REQs. Verification reports are available on the Commission's website.

The Commission elected not to conduct an on-site verification of the information provided in Yonggang's REQ. The Commission was able to benchmark the information provided in Yonggang's REQ against the information (domestic sales and CTMS data) provided by the other applicants.

The Commission is satisfied as to the accuracy, relevance and completeness of the information provided by the applicants.

4.3 Export price

4.3.1 Applicable legislation

Export price is determined in accordance with section 269TAB, taking into account whether the purchase or sale of goods was an arms length transaction under section 269TAA. The *Customs Amendment (Anti-Dumping Measures) Act 2017* (the amended section 269TAB to introduce specific provisions for exporters with zero or low volumes of exports. The following sections will discuss how the new legislation applies to the exporters in this review of measures.

4.3.2 Hunan Valin

It is the Commission's view that the application of subsection 269TAB(1) would require Hunan Valin to have exported the goods to Australia. As the Commission has found that Hunan Valin did not export the goods to Australia during the review period, the Commission has considered whether the requirements of subsection 269TAB(2A) have been met, and therefore whether Hunan Valin's export price is to be determined under 269TAB(2B).

PUBLIC RECORD

For Hunan Valin to be considered a ‘low volume exporter’ in accordance with subsection 269TAB(2A), the Minister must have regard to (i) previous volumes of exports by that exporter, (ii) patterns of trade for like goods, and (iii) factors affecting patterns of trade for like goods that are not within the control of the exporter.²³ The Commission has considered these elements as follows.

Previous volumes of exports by Hunan Valin – subsection 269TAB(2A)(b)(i)

Hunan Valin has previously exported the goods prior to the review period, during both the original investigation period (1 July 2014 to 30 June 2015) and the subsequent quarter. Hunan Valin has not exported the goods to Australia since the September 2016 quarter.

Patterns of trade for like goods – subsection 269TAB(2A)(b)(ii)

As shown below in Figure 1, while exports from China to Australia declined markedly around the time securities were implemented on exports of the goods from China, exports from all other countries increased substantially. The Commission interprets these results as the general market for the goods remaining persistent and that Hunan Valin’s lack of exports during the review period does not pertain to a general lack of exports or low volumes of exports to Australia.

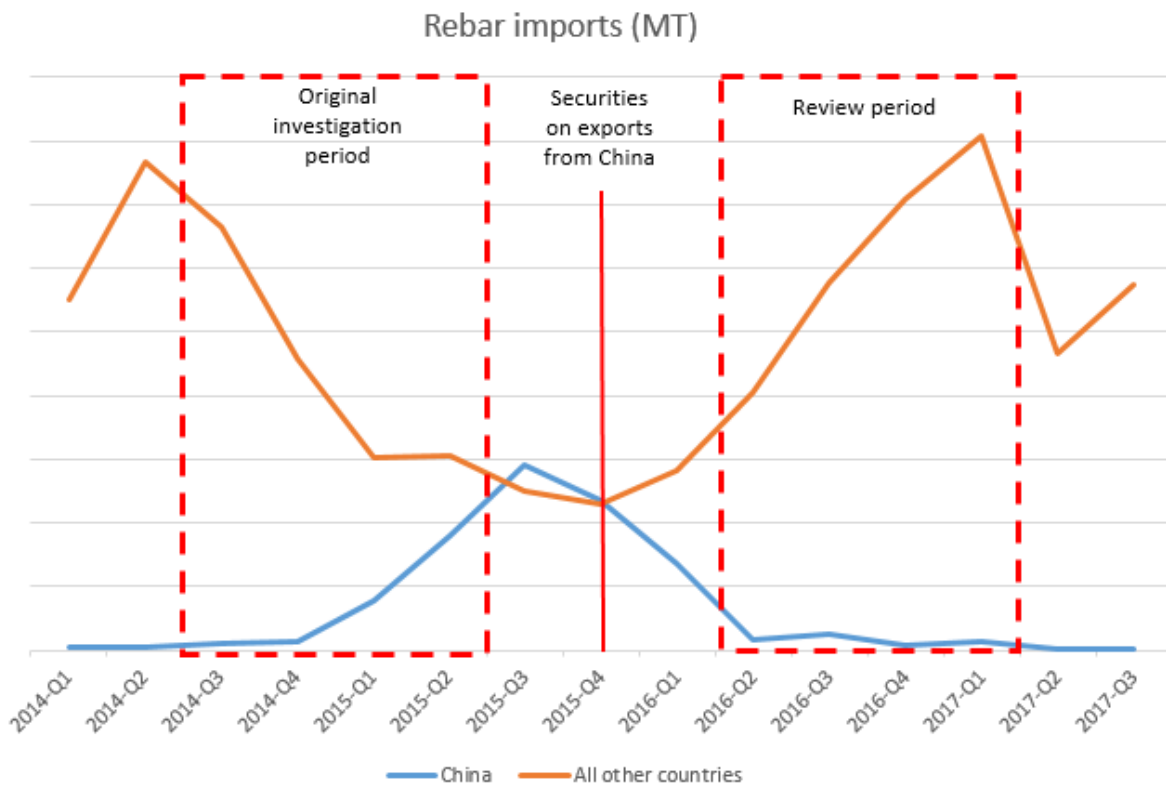


Figure 1

²³ Subsection 269TAB(2A)(b)

PUBLIC RECORD

Factors affecting patterns of trade – subsection 269TAB(2A)(b)(iii)

The Commission does not have any information regarding factors outside the exporters' control. Further, no relevant information has been made available by the exporters during verification visits or by submission. Also, the last SEF extension ADN No. 2017/150 published on 27 October 2017 advised that the reason for the extension was the amendments to the Act and the requirement for the Commission to consider if the changes will affect the determination of export prices for exporters subject to these reviews. No submissions from the exporters or any other interested parties have been received.

Commission's consideration – subsection 269TAB(2A)

Having regard to the above, the Commission considers Hunan Valin, under subsection 269TAB(2A), to be a 'low volume' exporter. The Commission considers that there is insufficient or unreliable information to ascertain the export price due to an absence or low volume of exports. Hunan Valin previously exported the goods to Australia, despite the reduction in exports to Australia from China imports of rebar overall have remained steady and, the Commission is not aware of any factors affecting the patterns of trade that are beyond Hunan Valin's control.

The Commission therefore considers it appropriate to ascertain export prices under subsection 269TAB(2B). Under that subsection the Commission is able to determine an export price having regard to any of the following:

- a previous export price for the goods exported to Australia by Hunan Valin established in accordance with subsection 269TAB(1) for a decision of a kind mentioned in subsection 269TAB(2D);²⁴
- the price paid or payable for like goods sold by Hunan Valin in arms length transactions for exportation from China to a third country determined by the Minister to be an appropriate third country;²⁵
- an export price for like goods exported to Australia from China by another exporter or exporters established in accordance with subsection 269TAB(1) for a decision mentioned in subsection 269TAB(2D).²⁶

Previous export price – subsection 269TAB(2B)(a)

Hunan Valin is listed on the notice pertaining to the original investigation and the Minister determined Hunan Valin's export price under subsection 269TAB(1) for the purposes of publishing the notice under subsection 269TG(2). This is Hunan Valin's current export price. The decision to publish a notice under subsection 269TG(2) is a decision mentioned in subsection 269TAB(2D). Notice of the decision under subsection 269TG(2) was published on 13 April 2016, which is within two years before the notice of this review under subsection 269ZC(4) was published, which

²⁴ Subsection 269TAB(2B)(a)

²⁵ Subsection 269TAB(2B)(b)

²⁶ Subsection 269TAB(2B)(c)

PUBLIC RECORD

occurred on 19 May 2017.²⁷ Therefore subsection 269TAB(2B)(a) is available for determining the export price.

Third country export price – subsection 269TAB(2B)(b)

As confirmed during a verification visit, Hunan Valin did not export rebar to any third countries during the review period,²⁸ therefore subsection 269TAB(2B)(b) is not available for determining the export price.

Another exporter's export price – subsection 269TAB(2B)(c)

Shandong Shiheng Special Steel Group, Shandong Iron and Steel Company Ltd, Laiwu Company and Yonggang are all exporters listed on the notice pertaining to the original investigation for which the Minister determined an export price under subsection 269TAB(1) for the purposes of publishing the notice under subsection 269TG(2). The decision to publish a notice under subsection 269TG(2) is a decision mentioned in subsection 269TAB(2D), therefore subsection 269TAB(2B)(c) is also available for determining the export price.

Commission's consideration – subsection 269TAB(2B)

Only two options under subsection 269TAB(2B) are available for determining Hunan Valin's export price²⁹ and there is no hierarchy in the Act.

The Commission has considered both options and finds that Hunan Valin's current export price established in accordance with subsection 268TAB(1) in the dumping duty notice is the most appropriate as it reflects actual prices received by the particular exporter for the specific grades of rebar and products sold in the Australian market.

Adjustments to the export price – subsection 269TAB(2G)

Subsection 269TAB(2G) allows the Minister to make adjustments to the export price ascertained under subsection 269TAB(2B) to reflect what the export price would have been had there not been an absence of exports by Hunan Valin. Such adjustments may include:

- adjustments due to exports relating to earlier times (timing adjustment);³⁰
- adjustments due to exports relating to not identical goods (specification adjustment);³¹

Hunan Valin's current export price is based on exports to Australia during the original investigation period 1 July 2014 to 30 June 2015. The Commission notes that global steel prices have moved since that time.

²⁷ Per subsection 269TAB(2E)

²⁸ See Hunan Valin exporter visit report, document 008 on the electronic public record (EPR 412) on the Commission's website www.adcommission.gov.au

²⁹ Subsections 269TAB(2B)(a) and (c)

³⁰ Subsection 269TAB(2G)(a)

³¹ Subsection 269TAB(2G)(b)

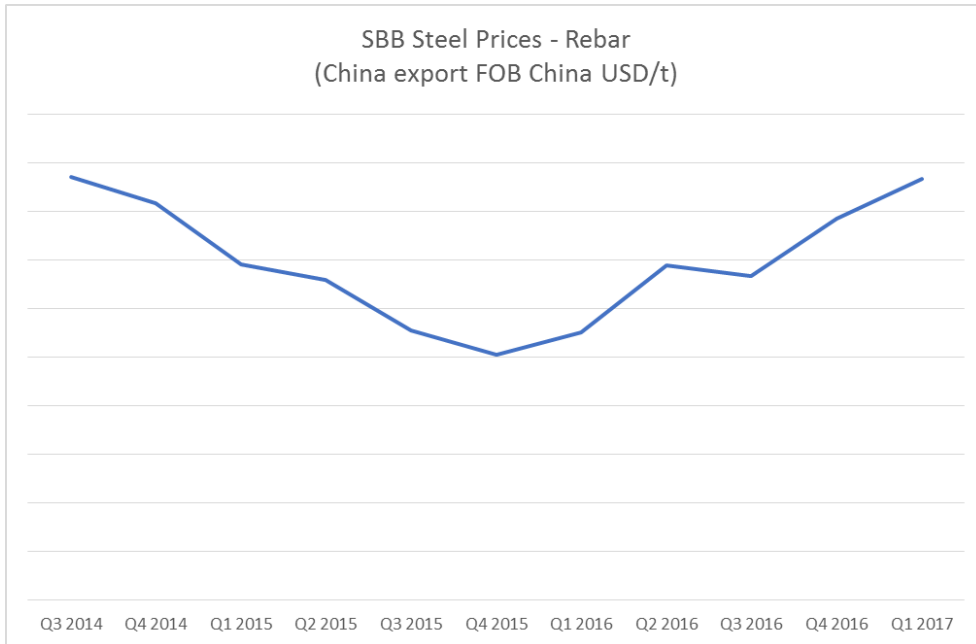


Figure 2

The Commission therefore considers that a timing adjustment is required to reflect what Hunan Valin’s export price would have been during the review period. The Commission has used published steel pricing data from Platts, specifically the average price of rebar exported from China for the original investigation period compared to the average price of the same for the review period. The Commission notes that the average price for the review period is 1.1% lower than for the original investigation period. Accordingly, the Commission has adjusted the export price determined during the original investigation by decreasing it by 1.1% to reflect the lower prices for rebar during the review period.

As a result, the ascertained export price for Hunan Valin’s exports of the goods has changed.

4.3.3 Shagang

It is the Commission’s view that the application of subsection 269TAB(1) would require Shagang to have exported the goods to Australia. As the Commission has found that Shagang did not export the goods to Australia during the review period, the Commission has considered whether the requirements of subsection 269TAB(2A) have been met, and therefore whether Shagang’s export price is to be determined under 269TAB(2B) or subsection 269TAB(3).

For Shagang to be considered a ‘low volume exporter’ in accordance with subsection 269TAB(2A), the Minister must have regard to (i) previous volumes of exports by that exporter, (ii) patterns of trade for like goods, and (iii) factors affecting patterns of trade for like goods that are not within the control of the exporter.³²

³² Subsection 269TAB(2A)(b)

PUBLIC RECORD

Previous volumes of exports by Shagang – subsection 269TAB(2A)(b)(i)

Shagang has not previously exported the goods prior to the review period. The Commission notes that the explanatory memorandum for the *Customs Amendment (Anti-Dumping Measures) Act 2017* states:

[...] where an Exporter has never exported the goods subject to measures to Australia. In a review of measures in relation to that Exporter, if there have still been no exports, it may be appropriate to determine that Exporter's export price under subsection 269TAB(3) despite the methods in new subsection 269TAB(2B).

Patterns of trade for like goods – subsection 269TAB(2A)(b)(ii)

As shown above in Figure 1, while exports from China to Australia declined markedly around the time securities were implemented on exports of the goods from China, exports from all other countries increased substantially. The Commission interprets these results as the general market for the goods remaining persistent and that Shagang's lack of exports during the review period does not pertain to a general lack of exports or low volumes of exports to Australia.

Factors affecting patterns of trade – subsection 269TAB(2A)(b)(iii)

The Commission does not have any information regarding factors outside the exporters' control. Further, no relevant information has been made available by the exporters during verification visits or by submission. Also, the last SEF extension ADN No. 2017/150 published on 27 October 2017 advised that the reason for the extension was the amendments to the Act and the requirement for the Commission to consider if the changes will affect the determination of export prices for exporters subject to these reviews. No submissions from the exporters or any other interested parties have been received.

Commission's consideration – subsection 269TAB(2A)

Having regard to the above, the Commission considers Shagang, under subsection 269TAB(2A), not to be a 'low volume' exporter. Shagang has not previously exported the goods to Australia and it appears from the explanatory memorandum for the *Customs Amendment (Anti-Dumping Measures) Act 2017* that the Parliament did not intend for the export price to be determined under subsection 269TAB(2B) in such circumstances.

The Commission therefore considers it appropriate to determine the export price of the goods under subsection 269TAB(3) having regard to all relevant information.

The Commission has considered all relevant information and is of the view that an exporter who has not previously exported the goods into the Australia market will foremost, to be competitive, need to make decisions about the types of product demanded by the Australian market, and from that basis, decisions about the pricing of those products. The Commission is further of the view that factors such as product type and pricing will differ across markets, including between domestic markets and export markets.

The Commission notes that setting an ascertained export price based on an exporter's normal value as determined under subsection 269TAC(1) fundamentally involves setting the export price to reflect the product composition as it relates to the domestic market. The Commission considers that information about an exporter's

sales into a domestic market does not represent the most relevant and reliable information for determining an ascertained export price under subsection 269TAB(3) where comprehensive, verified information about the Australian market is available.

For these reasons the Commission has determined an export price for Shagang pursuant to subsection 269TAB(3), having regard to all relevant information, as the average of the export prices ascertained for Hunan Valin and Yonggang as discussed in this report.

As a result, the ascertained export price applicable to exports of the goods by Shagang has changed.

4.3.4 Yonggang

It is the Commission's view that the application of subsection 269TAB(1) would require Yonggang to have exported the goods to Australia. As the Commission has found that Yonggang did export a relatively small amount of the goods to Australia during the review period, the Commission has considered whether the requirements of subsection 269TAB(2A) have been met, and therefore whether Yonggang's export price is to be determined under 269TAB(2B).

For Yonggang to be considered a 'low volume exporter' in accordance with subsection 269TAB(2A), the Minister must have regard to (i) previous volumes of exports by that exporter, (ii) patterns of trade for like goods, and (iii) factors affecting patterns of trade for like goods that are not within the control of the exporter.³³ The Commission has considered these elements as follows.

Previous volumes of exports by Yonggang – subsection 269TAB(2A)(b)(i)

Yonggang has previously exported the goods prior to the review period, during both the original investigation period and subsequently thereafter, and in relatively higher volumes than that recorded during the review period.

Patterns of trade for like goods – subsection 269TAB(2A)(b)(ii)

As shown above in Figure 1, while exports from China to Australia declined markedly around the time securities were implemented on exports of the goods from China, exports from all other countries increased substantially. The Commission interprets these results as the general market for the goods remaining persistent and that Yonggang's relatively small amount of exports during the review period does not pertain to a general lack of exports or low volumes of exports to Australia.

Factors affecting patterns of trade – subsection 269TAB(2A)(b)(iii)

The Commission does not have any information regarding factors outside the exporters' control. Further, no relevant information has been made available by the exporters during verification visits or by submission. Also, the last SEF extension ADN No. 2017/150 published on 27 October 2017 advised that the reason for the extension was the amendments to the Act and the requirement for the Commission to consider if the changes will affect the determination of export prices for exporters

³³ Subsection 269TAB(2A)(b)

PUBLIC RECORD

subject to these reviews. No submissions from the exporters or any other interested parties have been received.

Commission's consideration – subsection 269TAB(2A)

Having regard to the above, the Commission considers Yonggang, under subsection 269TAB(2A), to be a 'low volume' exporter. Yonggang previously exported the goods to Australia, despite the reduction in exports to Australia from China imports of rebar overall have remained steady and, the Commission is not aware of any factors affecting the patterns of trade that are beyond Yonggang's control.

The Commission therefore considers it appropriate to ascertain export prices under subsection 269TAB(2B). Under that subsection the Commission is able to determine an export price having regard to any of the following:

- a previous export price for the goods exported to Australia by Yonggang established in accordance with subsection 269TAB(1) for a decision of a kind mentioned in subsection 269TAB(2D);³⁴
- the price paid or payable for like goods sold by Yonggang in arms length transactions for exportation from China to a third country determined by the Minister to be an appropriate third country;³⁵
- an export price for like goods exported to Australia from China by another exporter or exporters established in accordance with subsection 269TAB(1) for a decision mentioned in subsection 269TAB(2D).³⁶

Previous export price – subsection 269TAB(2B)(a)

Yonggang is listed on the notice pertaining to the original investigation and the Minister determined Yonggang's export price under subsection 269TAB(1) for the purposes of publishing the notice under subsection 269TG(2). This is Yonggang's current export price. The decision to publish a notice under subsection 269TG(2) is a decision mentioned in subsection 269TAB(2D). Notice of the decision under subsection 269TG(2) was published on 13 April 2016, which is within two years before the notice of this review under subsection 269ZC(4) was published, which occurred on 19 May 2017.³⁷ Therefore subsection 269TAB(2B)(a) is available for determining the export price.

Third country export price – subsection 269TAB(2B)(b)

Yonggang exported rebar to a number of third countries during the review period, therefore subsection 269TAB(2B)(b) is available for determining the export price.

Another exporter's export price – subsection 269TAB(2B)(c)

Hunan Valin, Shandong Shiheng Special Steel Group and Shandong Iron and Steel Company Ltd, Laiwu Company are all exporters listed on the notice pertaining to the

³⁴ Subsection 269TAB(2B)(a)

³⁵ Subsection 269TAB(2B)(b)

³⁶ Subsection 269TAB(2B)(c)

³⁷ Per subsection 269TAB(2E)

PUBLIC RECORD

original investigation for which the Minister determined an export price under subsection 269TAB(1) for the purposes of publishing the notice under subsection 269TG(2). The decision to publish a notice under subsection 269TG(2) is a decision mentioned in subsection 269TAB(2D), therefore subsection 269TAB(2B)(c) is also available for determining the export price.

Commission's consideration – subsection 269TAB(2B)

All three options under subsection 269TAB(2B) are available for determining Yonggang's export price and there is no hierarchy in the Act.

The Commission has considered all three options and finds that Yonggang's current export price established in accordance with subsection 268TAB(1) is the most appropriate as it reflects actual prices received by the particular exporter for the specific grades of rebar and products sold in the Australian market.

An export price based on Yonggang's third country sales would require the Minister to determine an appropriate third country from a large number of possible countries and make specification adjustments due to differences in grades and standards between that country and Australia.

Adjustments to the export price – subsection 269TAB(2G)

Subsection 269TAB(2G) allows the Minister to make adjustments to the export price ascertained under subsection 269TAB(2B) to reflect what the export price would have been had there not been an absence of exports by Yonggang. Such adjustments may include:

- adjustments due to exports relating to earlier times (timing adjustment);³⁸
- adjustments due to exports relating to not identical goods (specification adjustment);³⁹

Yonggang's current export price is based on exports to Australia during the original investigation period 1 July 2014 to 30 June 2015. The Commission notes that global steel prices have moved since that time as depicted in Figure 2, above.

The Commission therefore considers that a timing adjustment is required to reflect what Yonggang's export price would have been during the review period. The Commission has used published steel pricing data from Platts, specifically the average price of rebar exported from China for the original investigation period compared to the average price of the same for the review period. The Commission notes that the average price for the review period is 1.1% lower than for the original investigation period. Accordingly, the Commission has adjusted the export price determined during the original investigation by decreasing it by 1.1% to reflect the lower prices for rebar during the review period.

As a result, the ascertained export price for Yonggang's exports of the goods has changed.

³⁸ Subsection 269TAB(2G)(a)

³⁹ Subsection 269TAB(2G)(b)

4.4 Normal value

4.4.1 Applicable legislation

Subsection 269TAC(1) provides that the normal value of any goods exported to Australia is the price paid or payable for like goods sold in the ordinary course of trade for home consumption in the country of export in sales that are arms length transactions by the exporter, or, if like goods are not so sold by the exporter, by other sellers of like goods.

However, subsection 269TAC(2)(a)(ii) provides that, where the Parliamentary Secretary is satisfied that:

...because the situation in the market of the country of export is such that sales in that market are not suitable for use in determining a price under subsection (1),

the normal value of the goods exported to Australia cannot be ascertained under subsection 269TAC(1).

Where such a 'particular market situation' exists, the normal value can be determined on the basis of a cost construction (subsection 269TAC(2)(c)), or third country sales (subsection 269TAC(2)(d)).

4.4.2 Particular market situation

Investigation 300 established that, in accordance with subsection 269TAC(2)(a)(ii), a situation exists in the domestic Chinese market that renders domestic selling prices of rebar as being unsuitable for the purposes of determining normal values for rebar under subsection 269TAC(1), i.e. a particular market situation.

Accordingly, normal values for cooperating exporters were constructed pursuant to subsection 269TAC(2)(c). Subsection 269TAC(2)(c) provides that, where the normal value cannot be ascertained under subsection 269TAC(1), the normal value of the goods is to be calculated as:

- the cost of production or manufacture of the goods in the country of export; and
- on the assumption that the goods, instead of being exported, had been sold for home consumption in the ordinary course of trade in the country of export, the selling, general and administrative costs associated with such a sale and the profit on that sale.

During Investigation 300, it was found that, in determining the cost of manufacture of the goods, the records of Chinese exporters of rebar did not reasonably reflect competitive market costs associated with the production and manufacture of those goods, for the purposes of section 43 of the *Customs (International Obligations) Regulation 2015* (the Regulation).

Specifically, the Commission then indicated that:

The Commission considers that direct and indirect influences of the Government of China affect Chinese manufacturers' costs to produce steel billet.

PUBLIC RECORD

Because steel billet costs represent a significant proportion of the cost to manufacture rebar, Investigation 300 replaced the steel billet costs recorded in the exporters' records in order to reflect a competitive market cost for steel billet when constructing normal values.

In the applicants' original applications, no claims were made regarding the particular market situation found in Investigation 300. Additionally, no submissions were made during or after the verification visits regarding the particular market situation found in Investigation 300.

After the Commission initiated the current reviews, a questionnaire was sent to the Government of China (GOC) to ascertain whether the market situation found in Investigation 300 had changed. The GOC, however, did not provide a response to the questionnaire.

Furthermore, the Commission considers that since the final report for Investigation 300 was published on 13 April 2016, it is unlikely the market situation found then has changed significantly. Additionally, both Hunan Valin and Yonggang (which is also related to Shagang) were cooperating exporters during the original investigation, and the Commission considers those companies are likely to be operating under similar conditions to that found in the original investigation. The Commission also notes that the GOC's 13th Five Year Economic Development Plan referenced in the market situation assessment for Investigation 300 is still current.⁴⁰

In the absence of any information to indicate that the particular market situation found in Investigation 300 has changed, the Commission considers that the GOC continues to exert numerous influences on the Chinese iron and steel industry, including the producers of steel billet specifically for the production of rebar, which has substantially distorted competitive market conditions in the rebar industry in China.

The Commission therefore considers that a particular market situation for rebar exists, and that the normal values for the applicants cannot be ascertained under subsection 269TAC(1). The Commission has therefore ascertained the normal values for Shagang, Hunan Valin, and Yonggang under subsection 269TAC(2)(c).

4.5 Constructed normal value

Subsection 269TAC(2)(c) provides that, where the normal value cannot be ascertained under subsection 269TAC(1), the normal value of the goods is to be calculated as:

- the cost of production or manufacture of the goods in the country of export; and
- on the assumption that the goods had been sold for home consumption in the ordinary course of trade in the country of export, the administrative, selling and general costs associated with such a sale and the profit on that sale.

⁴⁰ *Anti-Dumping Commission Report No. 300*, p. 91

4.5.1 Cost of production

As noted above, subsection 269TAC(2)(c) requires that the cost of production or manufacture of the goods be used in determining constructed normal values. As required by subsection 269TAC(5A)(a), the cost of production or manufacture must be worked out in accordance with section 43 of the Regulation.

To determine the cost of production or manufacture, subsection 43(2) requires that if:

- an exporter or producer keeps records relating to like goods that are in accordance with generally accepted accounting principles in the country of export; and
- those records reasonably reflect competitive market costs associated with the production or manufacture of like goods;

the Parliamentary Secretary must work out the cost of production or manufacture using information set out in the exporter or producer's records.

It is the Commission's policy and practice that, where the conditions of subsection 43(2) of the Regulation are not met, the cost records kept by that exporter are not required to be used in working out their costs, and the Commission may resort to other information to calculate these costs.

Given the significant distortions in the steel market in China outlined in section 4.4.2 of this report, the Commission considers applicant's recorded costs of steel billet do not reflect competitive market costs.

Approach to replacing steel billet costs in Investigation 300

In Investigation 300, the Commission substituted the cooperating exporters' fully absorbed steel billet CTM values with the corresponding Latin American FOB level steel billet export price from Platts for the month minus an average rate of profit that the Chinese exporters realised for the sale of billets in their domestic market.

Approach to replacing HRC costs in current reviews

For the purpose of these reviews, the Commission has available to it verified steel billet costs obtained from cooperating exporters and manufacturers in Investigations 416 and 418. The Commission considers that in the current case these verified costs most accurately reflect the cost of production of steel billet relevant to the manufacture of the goods exported to Australia during the review period.

Given that the applicants are fully-integrated manufacturers of the goods, and given the availability of verified and relevant information from Investigations 416 and 418, the Commission considers that it is appropriate to use verified costs of steel billet manufacturers (at comparable terms) in Indonesia, Korea, Spain, Taiwan, Thailand, and Vietnam for the purpose of replacing the applicants' steel billet costs.

The Commission has verified cost data, relating to steel billet costs for the period 1 April 2016 to 31 March 2017, encompassing all four quarters of the review period.

Details of the competitive market cost benchmark calculation is at **Confidential Appendix 1 – Steel billet benchmark**.

4.6 Determination of constructed normal values

4.6.1 Hunan Valin

As outlined in section 4.4.2 of this report, the Commission considers the steel billet costs provided by Hunan Valin do not reasonably reflect competitive market costs. Therefore, the Commission has replaced Hunan Valin's steel billet costs with a competitive market cost benchmark.

As required by subsection 269TAC(5A)(b), in ascertaining the normal value of the goods under subsection 269TAC(2)(c), the selling, general and administrative costs for Hunan Valin have been determined in accordance with subsection 44(2) of the Regulation.

In addition, as required by subsection 269TAC(5B), in ascertaining the normal value of the goods under subsection 269TAC(2)(c), the amount of profit included in the normal value is to be determined having regard to section 45 of the Regulation. Subsection 45(2) of the Regulation requires that, where reasonably practicable, profit must be worked out using data relating to the production and sale of like goods by the exporter or producer of the goods in the ordinary course of trade.

Accordingly, the Commission has calculated a profit margin for like goods. The calculation of this profit margin was based on domestic sales of like goods in the ordinary course of trade, the selling prices of which were compared to Hunan Valin's actual cost to make and sell of those goods (i.e. prior to replacing Hunan Valin's recorded steel billet costs as discussed above).

In order to ensure the normal value is properly comparable with the export price of the goods, the Commission adjusted Hunan Valin's normal value in accordance with subsection 269TAC(9). The normal value for Hunan Valin has been calculated at the FOB level, cash terms. The below table summarises the adjustments made to Hunan Valin's normal value.

Adjustment Type	Deduction/addition
Export inland freight, handling and port charges	Add the cost of inland freight, handling and port charges
Non-refundable VAT	Add the portion of non-refundable VAT, on the assumption that the goods, instead of being sold domestically, were to have been exported.

The resulting ascertained normal value for Hunan Valin in respect of rebar has changed since Investigation 300.

Details of the preliminary normal value calculations for Hunan Valin are at **Review 412 - Confidential Appendices 1 to 3**.

4.6.2 Shagang

As outlined in section 4.4.2 of this report, the Commission considers the steel billet costs provided by Shagang do not reasonably reflect competitive market costs. Therefore, the Commission has replaced Shagang’s steel billet costs with a competitive market cost benchmark.

As required by subsection 269TAC(5A)(b), in ascertaining the normal value of the goods under subsection 269TAC(2)(c), the selling, general and administrative costs for Shagang have been determined in accordance with subsection 44(2) of the Regulation.

In addition, as required by subsection 269TAC(5B), in ascertaining the normal value of the goods under subsection 269TAC(2)(c), the amount of profit included in the normal value is to be determined having regard to section 45 of the Regulation. Subsection 45(2) of the Regulation requires that, where reasonably practicable, profit must be worked out using data relating to the production and sale of like goods by the exporter or producer of the goods in the ordinary course of trade.

Accordingly, the Commission has calculated a profit margin for like goods. The calculation of this profit margin was based on domestic sales of like goods in the ordinary course of trade, the selling prices of which were compared to Shagang’s actual cost to make and sell of those goods (i.e. prior to replacing Shagang’s recorded steel billet costs as discussed above).

In order to ensure the normal value is properly comparable with the export price of the goods, the Commission adjusted Shagang’s normal value in accordance with subsection 269TAC(9). The normal value for Shagang has been calculated at the FOB level, cash terms. The below table summarises the adjustments made to Shagang’s normal value.

Adjustment Type	Deduction/addition
Export inland freight, handling and port charges	Add the cost of inland freight, handling and port charges
Non-refundable VAT	Add the portion of non-refundable VAT, on the assumption that the goods, instead of being sold domestically, were to have been exported.

The resulting ascertained normal value for Shagang in respect of rebar has changed since Investigation 300.

Details of the preliminary normal value calculations for Shagang are at **Review 411 - Confidential Appendices 1 to 3**.

4.6.3 Yonggang

As outlined in section 4.4.2 of this report, the Commission considers the steel billet costs provided by Yonggang do not reasonably reflect competitive market costs.

PUBLIC RECORD

Therefore, the Commission has replaced Yonggang's steel billet costs with a competitive market cost benchmark.

As required by subsection 269TAC(5A)(b), in ascertaining the normal value of the goods under subsection 269TAC(2)(c), the selling, general and administrative costs for Yonggang have been determined in accordance with subsection 44(2) of the Regulation.

In addition, as required by subsection 269TAC(5B), in ascertaining the normal value of the goods under subsection 269TAC(2)(c), the amount of profit included in the normal value is to be determined having regard to section 45 of the Regulation. Subsection 45(2) of the Regulation requires that, where reasonably practicable, profit must be worked out using data relating to the production and sale of like goods by the exporter or producer of the goods in the ordinary course of trade.

Accordingly, the Commission has calculated a profit margin for like goods. The calculation of this profit margin was based on domestic sales of like goods in the ordinary course of trade, the selling prices of which were compared to Yonggang's actual cost to make and sell of those goods (i.e. prior to replacing Yonggang's recorded steel billet costs as discussed above).

In order to ensure the normal value is properly comparable with the export price of the goods, the Commission adjusted Yonggang's normal value in accordance with subsection 269TAC(9). The normal value for Yonggang has been calculated at the FOB level, cash terms. The below table summarises the adjustments made to Yonggang's normal value.

Adjustment Type	Deduction/addition
Export inland freight, handling and port charges	Add the cost of inland freight, handling and port charges
Non-refundable VAT	Add the portion of non-refundable VAT, on the assumption that the goods, instead of being sold domestically, were to have been exported.

The resulting ascertained normal value for Yonggang in respect of rebar has changed since Investigation 300.

Details of the preliminary normal value calculations for Yonggang are at **Review 423 - Confidential Appendices 1 to 3**.

4.7 Dumping margins

During the review OneSteel submitted that the transaction-to-transaction method under subsection 269TACB(2)(b) should be applied to determine whether dumping has occurred.⁴¹ Typically a transaction-to-transaction method is a comparison of a

⁴¹ Document number 004 on the electronic public record for Reviews 411, 412 and 423

PUBLIC RECORD

domestic transaction selling price to a corresponding export price. However in the case of Yonggang the normal values have been constructed based on quarterly cost data. In these circumstances, the Commission is not satisfied that a transaction-to-transaction method is meaningful. In any event, applying the method described in subsection 269TACB(2)(b) in this case would appear to achieve the same result as the Commission’s usual method, being the weighted average-to-weighted average method under subsection 269TACB(2)(a).

The Commission has determined dumping margins for Hunan Valin, Shagang and Yonggang under subsection 269TACB(2)(a) by comparing the weighted average export price over the review period with the weighted average of corresponding normal values over that period. The resulting dumping margins are detailed below.

Hunan Valin	Shagang	Yonggang
7.5 per cent	-4.7 per cent	-0.96 per cent

5 NON-INJURIOUS PRICE

5.1 Introduction

Dumping duties⁴² may be imposed where the Parliamentary Secretary is satisfied that dumped exports of the goods to Australia have caused or threatened to cause material injury to the Australian industry producing like goods. Under subsection 269TACA(a) of the Act, the NIP of the goods exported to Australia is the minimum price necessary to prevent the injury, or a recurrence of the injury, to the Australian industry by dumped goods.

Pursuant to subsection 8(5BAA) of the *Customs Tariff (Anti-Dumping) Act 1975*, the Parliamentary Secretary is not required to have regard to the desirability of fixing a lesser amount of duty if he is satisfied that either or both of the following apply in relation to the goods the subject of the notice:

- a) the normal value of the goods was not ascertained under subsection 269TAC(1) because of the operation of subsection 269TAC(2)(a)(ii);
- b) there is an Australian industry in respect of like goods that consists of at least two small-medium enterprises, whether or not that industry consists of other enterprises.

5.2 Commission's assessment

The Commission has found that, in accordance with subsection 269TAC(2)(a)(ii), the normal value of rebar exported to Australia from China cannot be ascertained under subsection 269TAC(1) because the situation in the Chinese market is such that sales in that market are not suitable for use in determining a price under subsection 269TAC(1). As such, the Commission notes that the Parliamentary Secretary is not required to have regard to the desirability of fixing a lesser rate of duty and the duty must be calculated and taken at full dumping margins in relation to rebar imported from China.

⁴² In the form of a dumping duty notice under subsection 269TG(1) or (2) of the Act.

6 FINDINGS AND PROPOSED RECOMMENDATIONS

6.1 Findings

The Commissioner has found, in respect of exports of rebar to Australia from China by the applicants, that:

- the ascertained export price has changed;
- the ascertained normal value has changed; and
- due to the existence of a 'particular market situation' the Parliamentary Secretary is not required to have regard to the desirability of fixing a lesser rate of duty.

6.2 Proposed recommendations

The Commissioner proposes to recommend to the Parliamentary Secretary that the notices in respect of exports of rebar to Australia from China have effect in relation to the applicants as if different variable factors had been ascertained.

The Commissioner further recommends that the ascertained export price for the applicants be set equal to the ascertained normal value.

6.3 Proposed form of duty

The current anti-dumping measures are in the form of a combination duty, i.e. a combination of fixed and variable duty.⁴³ As Hunan Valin's export price is lower than its normal value, the Commissioner proposes to maintain the combination method for determining any interim dumping duty (IDD) payable on Hunan Valin's exports of the goods to Australia.

As Shagang and Yonggang's export prices are higher than their respective normal values, the Commissioner proposes to recommend to the Parliamentary Secretary that the IDD payable on the goods the subject of the dumping duty notice is an amount which will be worked out in accordance with the floor price duty method pursuant to subsection 5(4) of the *Customs Tariff (Anti-Dumping) Regulation 2013*. IDD will be payable if the actual export price is below the ascertained normal value which is a specified (confidential) amount per tonne.

A summary of the variable factors as they apply to each applicant is at **Confidential Appendix 2 - Summary of variable factors**.

⁴³ Per subsection 5(2) of the *Customs Tariff (Anti-Dumping) Regulation 2013*.

7 LIST OF APPENDICES AND ATTACHMENTS

Confidential Appendix 1	Steel billet benchmark
Confidential Appendix 2	Summary of variable factors
Review 411 - Confidential Appendix 1	Cost to make and sell - Shagang
Review 411 - Confidential Appendix 2	Domestic sales and profit - Shagang
Review 411 - Confidential Appendix 3	Domestic sales and profit - Shagang
Review 411 – Confidential Appendix 4	Normal value - Shagang
Review 411 – Confidential Appendix 5	Dumping Margin - Shagang
Review 412 - Confidential Appendix 1	Cost to make and sell – Hunan Valin
Review 412 - Confidential Appendix 2	Domestic sales and profit - Hunan Valin
Review 412 - Confidential Appendix 3	Domestic sales and profit - Hunan Valin
Review 412 – Confidential Appendix 4	Normal value - Hunan Valin
Review 412 – Confidential Appendix 5	Dumping Margin - Hunan Valin
Review 423 - Confidential Appendix 1	Export price - Yonggang
Review 423 – Confidential Appendix 2	Cost to make and sell - Yonggang
Review 423 - Confidential Appendix 3	Domestic sales and profit - Yonggang
Review 423 - Confidential Appendix 4	Normal Value calculation - Yonggang
Review 423 - Confidential Appendix 5	Dumping margin calculation - Yonggang