



**Australian Government**  
**Anti-Dumping Commission**

**PUBLIC RECORD**

## **INVESTIGATION 237**

# **ALLEGED DUMPING AND SUBSIDISATION OF SILICON METAL EXPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA**

## **VISIT REPORT - AUSTRALIAN INDUSTRY**

# **SIMCOA OPERATIONS PTY LTD**

**THIS REPORT AND THE VIEWS OR RECOMMENDATIONS CONTAINED THEREIN  
WILL BE REVIEWED BY THE CASE MANAGEMENT TEAM AND MAY NOT REFLECT  
THE FINAL POSITION OF ANTI-DUMPING COMMISSION**

**March 2014**

# CONTENTS

<b>CONTENTS.....</b>	<b>2</b>
<b>ABBREVIATIONS.....</b>	<b>4</b>
<b>1 BACKGROUND AND PURPOSE.....</b>	<b>5</b>
1.1 BACKGROUND.....	5
1.2 PURPOSE OF VISIT .....	5
1.3 MEETING DETAILS .....	5
1.4 INVESTIGATION PROCESS AND TIMEFRAMES .....	6
1.5 VISIT REPORT .....	6
<b>2 THE GOODS.....</b>	<b>7</b>
2.1 DESCRIPTION .....	7
2.2 TARIFF CLASSIFICATION.....	7
<b>3 THE AUSTRALIAN INDUSTRY .....</b>	<b>8</b>
3.1 CORPORATE, ORGANISATIONAL AND OWNERSHIP STRUCTURE.....	8
3.2 ACCOUNTING STRUCTURE AND DETAILS OF ACCOUNTING SYSTEMS.....	8
3.3 RELATIONSHIP WITH SUPPLIERS AND CUSTOMERS .....	8
3.4 MANUFACTURING FACILITIES AND PRODUCT RANGE .....	9
3.5 PRODUCTION PROCESS .....	9
<b>4 LIKE GOODS .....</b>	<b>12</b>
4.1 GRADES OF SILICON METAL.....	12
4.2 PRODUCT RANGE .....	13
<b>5 AUSTRALIAN MARKET.....</b>	<b>15</b>
5.1 BACKGROUND.....	15
5.2 PRODUCT SEGMENTATION .....	15
5.3 DOMESTIC CUSTOMERS.....	15
5.4 IMPORTS BY APPLICANT .....	16
5.5 MARKET SIZE .....	16
5.6 EMPLOYMENT NUMBERS .....	17
5.7 ANNUAL TURNOVER .....	17
5.8 CAPACITY.....	17
<b>6 SALES.....</b>	<b>18</b>
6.1 GENERAL .....	18
6.2 MARKETING AND DISTRIBUTION.....	18
6.3 DOMESTIC SALES .....	18
6.4 EXPORT SALES.....	19
6.5 VERIFICATION OF DOMESTIC SALES DATA TO SOURCE DOCUMENTS .....	19
6.6 DISCOUNTS AND REBATES .....	19
6.7 VERIFICATION OF SALES DATA TO AUDITED FINANCIAL STATEMENTS.....	20
<b>7 COST TO MAKE AND SELL.....</b>	<b>21</b>
7.1 VERIFICATION OF COST TO MAKE AND SELL DATA TO MANAGEMENT REPORTS .....	21
7.2 PRODUCTION VOLUMES.....	21
7.3 RAW MATERIALS.....	22
7.4 OVERHEADS .....	22
7.5 DEPRECIATION .....	23
7.6 BY PRODUCTS .....	23
7.7 VERIFICATION OF SELLING, GENERAL AND ADMINISTRATION COSTS TO SOURCE DOCUMENTS.....	23

## PUBLIC RECORD

7.8	COSTS TO MAKE AND SELL – CONCLUSION .....	24
<b>8</b>	<b>ECONOMIC CONDITION .....</b>	<b>25</b>
8.1	APPLICANT’S INJURY CLAIMS .....	25
8.2	COMMENCEMENT OF INJURY, AND ANALYSIS PERIOD.....	25
8.3	VOLUME AND MARKET SHARE TRENDS.....	25
8.4	PRICE SUPPRESSION AND DEPRESSION .....	26
8.5	PROFITS AND PROFITABILITY .....	28
8.6	OTHER ECONOMIC FACTORS .....	28
8.7	CONCLUSION .....	29
<b>9</b>	<b>CAUSAL LINK .....</b>	<b>30</b>
9.1	PRICE EFFECTS.....	30
9.2	VOLUME EFFECTS.....	30
9.3	FACTORS OTHER THAN DUMPING .....	31
<b>10</b>	<b>UNSUPPRESSED SELLING PRICE .....</b>	<b>32</b>
<b>11</b>	<b>GENERAL COMMENTS.....</b>	<b>33</b>
<b>12</b>	<b>APPENDICES AND ATTACHMENTS.....</b>	<b>34</b>

## PUBLIC RECORD

### ABBREVIATIONS

\$	Australian dollars
The Act	<i>Customs Act 1901</i>
ABS	Australian Bureau of Statistics
ADN	Anti-Dumping Notice
The applicant	Simcoa Operations Pty Ltd
China	The People's Republic of China
the Commission	Anti-Dumping Commission
CTMS	Cost to make & sell
GOC	Government of China
NIP	Non-injurious Price
PAD	Preliminary Affirmative Determination
SEF	Statement of Essential Facts
the goods	the goods the subject of the application (also referred to as the goods under consideration or GUC)
Simcoa	Simcoa Operations Pty Ltd
the Minister	the Minister for Industry
the Parliamentary Secretary	the Parliamentary Secretary to the Minister for Industry
USP	Unsuppressed Selling Price

# 1 BACKGROUND AND PURPOSE

## 1.1 Background

On 10 January 2014, Simcoa Operations Pty Ltd (Simcoa) lodged an application requesting that the Parliamentary Secretary to the Minister for Industry (the Parliamentary Secretary) publish a dumping duty notice and countervailing duty notice in respect of silicon metal exported to Australia from the People's Republic of China (China).

Simcoa alleged that the Australian industry has suffered material injury caused by silicon metal exported to Australia from China at dumped and subsidised prices. Simcoa claims the industry had been injured through:

- Lost sales volumes;
- Reduced market share;
- Price depression;
- Price suppression;
- Loss of profits and profitability;
- Reduced return on investment; and
- Reduced capacity utilisation

Public notification of initiation of the investigation was made on 6 February 2014 in *The Australian* newspaper and by Australian Dumping Notice No. 2014/08.

## 1.2 Purpose of visit

The purpose of the visit was to:

- obtain general information about the Australian market for silicon metal;
- gain a greater understanding of the company's manufacturing, marketing and distribution processes;
- verify information provided in the application;
- obtain additional financial data about claimed injury to the Australian industry; and
- gather information relevant to assessing whether the allegedly dumped and subsidised imports had caused material injury to the Australian industry.

## 1.3 Meeting details

Company	Simcoa Operations Pty Ltd 973 Marriott Road Wellesley WA
Dates of visit	11 – 13 March 2014

The following were present at the meeting:

## PUBLIC RECORD

Simcoa	David Miles – Vice President Site Services and Marketing Kazuyuki Shimada – Manager Accounting and Finance
Consultant	John O'Connor (11/3/14 – 12/3/14)
The Commission	Nicole Platt: Manager Operations 2 Joanne Reid: Director Operations 2

### 1.4 Investigation process and timeframes

We advised the company of the investigation process and timeframes as follows.

- The investigation period is 1 January 2013 to 31 December 2013.
- The injury analysis period is from 1 January 2010 for the purpose of analysing the condition of the Australian industry.
- A preliminary affirmative determination (PAD) may be made no earlier than day 60 of the investigation (7 April 2014) and provisional measures may be imposed at the time of the PAD or at any time after the PAD has been made.

The Commission will not make a PAD until (and if) it becomes satisfied that there appears to be, or that it appears there will be, sufficient grounds for the publication of a dumping duty notice and/or countervailing duty notice.

- The Statement of Essential Facts (SEF) for the investigation is due to be placed on the public record by 27 May 2014, or such later date as the Parliamentary Secretary allows under s.269ZHI of the *Customs Act 1901* (the Act).

The SEF will set out the material findings of fact on which the Commission intends to base its recommendations to the Parliamentary Secretary, and will invite interested parties to respond, within 20 days, to the issues raised therein.

- Following receipt and consideration of submissions made in response to the SEF, the Commission will provide its final report and recommendations to the Parliamentary Secretary.

This final report is due no later than 11 July 2014, unless an extension to the SEF is approved by the Parliamentary Secretary.

### 1.5 Visit report

We explained to the company that we would prepare a report of our visit (this report) and provide it to the company to review its factual accuracy, and to identify those parts of the report it considers to be confidential.

We explained that, in consultation with the company, we would prepare a non-confidential version of the report, and place this on the investigation's Public Record.

## 2 THE GOODS

### 2.1 Description

The goods the subject of the application (the goods) are:

- Silicon metal containing at least 96.00 per cent but less than 99.99 per cent silicon by weight, and
- Silicon metal containing between 89.00 per cent and 96.00 per cent silicon by weight that contains aluminium greater than 0.20 per cent by weight,

of all forms (i.e. lumps, granules, or powder) and sizes.

The application stated:

The goods under consideration (GUC) includes all forms and sizes of silicon, including off-specification silicon such as silicon metal with high percentages of other elements, such as aluminium, calcium, iron, etc.

Silicon is a chemical element, of metallic appearance and steel grey in colour. It can be sold in lump, granule or powder form, and can be used in the same end-use applications whatever its form. Silicon is generally sold in lump form to the metallurgical industry and, in powder form to the chemicals industry. It is often referred to as a metal, although silicon possesses characteristics of both metals and non-metals (Silicon is a metalloid).

Silicon is principally used by primary and secondary aluminium producers as an alloying agent and by the chemical industry to produce silicones and photovoltaics. The type and level of impurities in the silicon generally influence the end-use application (i.e. whether 'primary' or 'secondary' use aluminium).

### 2.2 Tariff classification

The goods are classified to tariff subheading 2804.69.00 in Schedule 3 to the *Customs Tariff Act 1995* with statistical code 14.

The general rate of duty is currently "free" for goods imported from China.

## 3 THE AUSTRALIAN INDUSTRY

### 3.1 Corporate, organisational and ownership structure

Simcoa is a 100% owned subsidiary of Shin-Etsu Chemical Co., Ltd (Shin-Etsu), a company whose head office is in Tokyo, Japan. Simcoa's manufacturing site and administrative offices are located at Kemerton Industrial Park, Wellesley, about 160 kilometres south of Perth.

Simcoa has 100% ownership of two subsidiaries, Microsilica Pty Ltd (Microsilica) and Simcoa International Pty Ltd (Simcoa International). Microsilica markets and sells silica fume, a by-product from Simcoa's silicon production. It has no employees; all employment and administration is conducted by Simcoa. Simcoa International is a company that did not trade during the investigation period and contained only minor financial transactions and bank charges during this period.

Simcoa stated that it is the only Australian manufacturer of silicon and that it operates the only fully integrated silicon production plant in the world.

### 3.2 Accounting structure and details of accounting systems

Simcoa's financial year is 1 January to 31 December and its accounting practices are in accordance with Australian generally accepted accounting principles. Its accounts are audited by Deloitte in accordance with Australian Auditing Standards. Simcoa provided copies of the 2011 and 2012 audited special purpose financial reports in its application. At the time of the visit the 2013 financial reports had not been completed. Simcoa advised that it would provide a copy of the 2013 financial reports once they became available, likely towards the end of March 2014.

Simcoa operates an accounting system known as Atlas. Simcoa produced copies of the 2013 management report downloaded directly from this system to be used in reconciliations of the data provided in its application (**confidential attachment 7**). Simcoa advised that the data provided by these reports was the same information that had been provided to the auditors for preparation of the final reports for 2013 that would be available soon.

In addition Simcoa operates a separate inventory system known as CPR, which controls all the in-house stock management. CPR produces a summary daily based on data that is input at the source each day. This data is then entered into the main accounting system.

### 3.3 Relationship with suppliers and customers

Simcoa indicated that none of its domestic sales are to related customers. Review of the domestic sales data provided with the application confirms this.

Simcoa advised that it was purchased in 1996 by its parent company. Simcoa supplied silicon metal to the parent company for a while but now only occasionally supplies small amounts to its parent company in arms length transactions. We reviewed the A4 sales



data and observed that during the investigation period there were no sales listed to Simcoa's parent company.

Simcoa has an established customer base who generally require a regular supply of the goods. Simcoa will also produce special purpose silicon metal made to order based on a customer's specific needs.

### **3.4 Manufacturing facilities and product range**

#### **3.4.1 Manufacturing facilities**

At the verification visit we toured the site and manufacturing facilities. We observed the different stages of silicon metal production, from the preparation of the charcoal to the bagging of the silicon metal ready for shipment.

The silicon metal production facility runs three furnaces, 24 hours per day, seven days per week. It is run by staff in four shifts per day. Simcoa produces its own charcoal made from timber it sources from around the South West of Western Australia.

The manufacturing facility can be broken down into the following processes:

- Timber collection;
- Charcoal production;
- Furnace;
- Casting;
- Packaging.
- Filtration of offgases

Simcoa advised that it makes silicon metal to order, with approximately a 10 day turnover time from the time of production to time of shipment to the customer.

Simcoa has recently installed a coarse grinding plant to produce much finer silicon metal particles however the plant was inactive at the time of the visit. Silica fume, which is a by-product of the silicon metal production process, is also captured in a baghouse and sold as an additive for increasing strength in concrete.

Simcoa provided a copy of the manufacturing plant layout (**confidential attachment 2**).

### **3.5 Production process**

The Simcoa plant consists of a sawmill, two charcoal retorts, three arc electric furnaces, two bag houses for cleaning the furnace of gases and product packaging and despatch facilities. Simcoa provided a detailed description of the production process with diagrams in its application.

Silicon metal is produced by the carbothermic reduction of silica, presented as either quartz or quartzite. Carbon electrodes are used to create a regulated arc causing steep temperature gradients applied to a mix of quartz, carbonaceous reducing agents (being charcoal, coal, petroleum coke) and wood chips. The molten silicon is drained from the furnace via a taphole into ladles and then poured into chill frames on steel casting tables

## PUBLIC RECORD

which are lined with silicon metal particles for added protection. Solidified silicon metal is later crushed to the desired size for customer delivery.

Simcoa advised it extends the life of the casting tables by adding secondary grade silicon metal (referred to as “re-melt”) into the ladle to lower the molten silicon temperature before it is cast. Simcoa purchases small quantities of externally sourced silicon metal (mainly, but not always, Chinese product) for this purpose.

Simcoa uses high purity quartzite quarried from a mine it owns and operates at Moora, 180 kilometres north of Perth. It is transported from the mine by road. The quartzite is categorised and stockpiled into various grades depending on impurity levels.

Simcoa typically uses low ash charcoal made from eucalyptus marginata (a hardwood ‘jarrah’ timber). The wood used to manufacture charcoal is a mixture of forest residues from commercial logging for sawn timber and sawmill off cuts. Coals are also used as a carbon source, but these can contain more ash and therefore can have higher impurity levels.

Large volumes of raw materials and energy are used to produce silicon. As a rule of thumb the following quantities are required to make one tonne of silicon metal:

- [REDACTED] tonnes of quartz;
- [REDACTED] tonnes of woodchips;
- [REDACTED] of charcoal; and
- [REDACTED] of the total [REDACTED] cost is electricity.

It takes approximately 12 hours to process an amount of quartz into a finished silicon metal product.

Simcoa claims that its electricity consumption, per tonne of silicon produced, is the most efficient in the world and that other plants, particularly those in China, would have a much higher electricity consumption for each tonne of silicon produced.

Simcoa imports the carbon electrodes used in the electric arc furnace. These electrodes typically weigh 4,000 kilograms and Simcoa uses [REDACTED] electrodes per day per furnace.

Management develops a production schedule identifying the quantity of each grade required. The production department selects the raw materials required to achieve the specified product. The raw materials used to a large extent govern the impurity levels in the finished product. The chemical balance of the product can be established during the production process by altering the raw materials placed into the smelting process. The calcium and aluminium level can then be further refined in the final stages by further processing and refining. As the molten silicon is cast, samples are taken and analysed to confirm the grade.

Simcoa stated that the production processes for both primary and secondary use silicon are essentially the same; however primary grade silicon is usually associated with higher quality control and lower purity levels. Simcoa also stated that price margins for secondary aluminium are typically lower than primary grade because impurity levels are higher, quality control is less, and producers look for the cheapest raw material inputs

## **PUBLIC RECORD**

because they have less capacity to pay because of smaller profit margins. Simcoa manufactures numerous grades of silicon metal and these are predominately used to make primary aluminium alloys and chemical compounds. Simcoa's silicon metal can also be used to make secondary aluminium alloys, but the existence of lower price premiums make the use of Simcoa's product in these applications uneconomic in most regional markets.

The production process generates a number of by-products. Silica fume is extracted from the furnace off gases and is sold as a by-product, principally as a raw material for value added concrete. Charcoal fines are used to make BBQ briquettes. Undersized quartz is used for architecturally featured concrete. Dross from the refining of the silicon is sold as a feed for ferro alloy smelters that make silicon manganese. Sawdust is sold to landscape gardeners and chicken farms.

The production process is the same regardless of the form of silicon metal (eg lump, granules, fines) required for the end product. Further processing to refine the product creates differences in the chemistry of the final product. Customers can purchase from Simcoa's general product range or request a specific chemical specification which is then processed specially by Simcoa.

Simcoa has recently invested in production facilities, adding an extra furnace and coarse grinding plant with a plan to add an additional furnace if business conditions are favourable.

We are satisfied that at least one substantial process in the manufacture of silicon is carried out in Australia.

## 4 Like goods

Simcoa stated that it produces silicon metal matching the goods the subject of its application in that they are identical to, or very closely resemble, the imported silicon metal. The basis for this claim is that:

- The products have similar composition and chemical components;
- The products are directly substitutable;
- The products compete directly in the same markets; and
- The products have the same end-uses.

Simcoa submitted in its application that the essential characteristics are:

i. Physical likeness:

Silicon manufactured by Simcoa has the same physical and performance characteristics as imported silicon. There may be some variations in physical substance (i.e. in lump or powder form) however, this has more to do with handling requirements that as required for a specific end-use application;

ii. Commercial likeness:

Simcoa's locally produced silicon competes directly with imported silicon (whether primary or secondary silicon) in the Australian market.

iii Functional likeness

The locally-produced silicon and the imported silicon are used interchangeably in the same or comparable end-uses.

iv Production likeness

Silicon manufactured in Australia and imported silicon are produced in a similar manner. The silicon production processes and costs of production are similar.

### 4.1 Grades of silicon metal

Simcoa provided a copy of its technical specification data sheet for silicon metal in its application. (**confidential attachment 10**). The technical specification sheet showed seven different grades of silicon metal produced by Simcoa. Simcoa advised that six of the seven grades of silicon metal are used by primary aluminium smelters. Those six grades contain low iron, calcium and phosphorus levels. The remaining grade is usually sold to secondary aluminium producers. Primary and secondary uses are defined at paragraph 5.1 of this report. Simcoa also produce silicon metal for chemical use, however each user requires a specific chemical composition that is made to order. The grade of the raw material input, quartz, determines the resulting silicon metal grade, which can then be further refined by additional processing.

Simcoa advised that China produces four grades of silicon metal plus one chemical grade product and several of these grades are comparable to those produced by Simcoa.

## PUBLIC RECORD

Initially when China began producing silicon metal the product was only suitable for secondary end users, however now China produces a comparable graded product for the primary end users as well. The Chinese grades were provided as follows:

- 553 – secondary users only
- 441 – secondary users only
- 3303 – Simcoa advised their product grade begins at this level and increases in quality each additional grade
- 2202
- 3203 (chemical grade)

Simcoa provided details of what each of the numbers in the grading codes stood for. For example, the lowest grade 553 contains <0.5% iron, <0.5% aluminium and <0.3% calcium. As the grades increase the level of these impurities reduce. Higher quality products are more difficult to produce and so attract a premium price. There are fewer global suppliers of higher quality products so the supply/demand ratio changes and producers of higher quality silicon metal can usually expect a higher premium.

Simcoa provided a copy of the [redacted] [publication] month guide (**confidential attachment 19**). This publication tracks the pricing of the 553 Chinese grade of silicon metal and Simcoa uses guides such as this one to assist when setting their prices to customers. Simcoa advised that better grades of silicon metal derive a premium above the price indicated for the 553 grade product. As an example, Simcoa provided a price guide for the grades listed above showing the movement in FOB price changing by up to [redacted]% as the grades increased.

Simcoa advised that China does have suitable quartz available to produce a high quality silicon metal, however they believe China struggles to produce the required grades consistently which limits China's ability to supply the high grade products. Regional factors also affect China's exports of particular grades.

### 4.2 Product range

Simcoa makes a range of silicon metal goods including:

- lumps
- fines
- powder

Product is typically packed in bag sizes between 10kg and 1.2 tonne bulk packs.

Silicon metal is used extensively in metallurgy, chemical polymers and in the electronic and solar industries. It has five main uses:

- as an alloying element (hardener) with aluminium;
- to produce silicones (silicon based polymers for a variety of everyday use);
- to produce silicon chips in the electronic industry;
- to produce optical fibre and liquid crystal displays; and
- to produce solar panels.

## **PUBLIC RECORD**

Within Australia silicon metal is primarily used as an alloying element with aluminium. The products associated with all the other uses listed above are manufactured overseas.

Simcoa provided a copy of a silicon metal production and uses brochure (**attachment 1**) detailing the uses summarised above.

## 5 AUSTRALIAN MARKET

### 5.1 Background

Simcoa indicated the Australian market is divided into two segments. The first segment is sales to primary silicon metal users and the second segment is sales to secondary use channels.

A primary user requires a more pure silicon metal product for use in smelting aluminium used in the production of items that require stricter quality control, such as aluminium alloys used to produce car wheel rims. Secondary users require a lower grade product for use in aluminium alloys produced to make items such as car parts where the strength of the finished product is not as crucial or not required to meet such rigorous standards. Simcoa advised that it supplies both primary and secondary users and that often customers purchase silicon metal for both primary and secondary end uses. It is not possible to determine whether imported silicon metal is for primary or secondary use from the data currently available.

Simcoa stated that the total consumption of silicon in Australia is currently around [REDACTED] tonnes per year based on data from its sales records and information obtained from the Australian Bureau of Statistics (ABS). This figure is down from a previously estimated 15,000 to 18,000 tonnes per year.

### 5.2 Product Segmentation

Simcoa advised that silicon metal is sold and distributed across Australia. Silicon metal can be sold in various forms including granules, fine dust or lumps. All forms of the product can be packaged into whatever package size requested by the customer. During the tour of the manufacturing plant, we observed packaging of 1.2 tonne bags and saw stores of other packed sizes ready for delivery.

There is no geographic segmentation, nor is there product segmentation other than identifying whether the product is sold to primary or secondary aluminium applications.

### 5.3 Domestic Customers

Simcoa provided a list of its main domestic customers, both current and historical. They include the following:

[REDACTED]

Of those listed above, only two remain as current customers ([REDACTED]). Simcoa provided a spreadsheet of customer sales quantities by region and year for both domestic and export sales for the calendar years 1991-2013 (**confidential**).

**attachment 3).** This document demonstrated the decline in domestic sales volume by customer over the injury analysis period.

Simcoa advised most negotiations with customers are verbal and that procurement processes have changed over the years Simcoa has been supplying the domestic market. Simcoa usually deals directly with end users to facilitate sales. Simcoa advised that the main shift in supply occurred when its biggest customer moved its procurement process from its domestic offices to a head office overseas. Simcoa noted the timing of the loss in domestic sales corresponds with an increase in import levels, even in a contracting market.

#### **5.4 Imports by applicant**

During the investigation period Simcoa was the second largest importer of silicon metal based on the data available in the ACBPS import database. Simcoa imported [REDACTED] tonnes of the goods from China. Simcoa advised that these importations were for use in the production of silicon metal within the manufacturing process. Simcoa uses the [REDACTED] imported silicon metal as a coolant during the production process to protect the casting tables. No imported product is on-sold; it is all used assisting production of Simcoa’s own silicon metal product.

#### **5.5 Market size**

Simcoa indicated the market size to be approximately [REDACTED] tonnes. The estimate was based on Simcoa’s own sales data and data obtained from the ABS.

The Commission confirmed that Simcoa’s estimate was reasonably accurate. This is based on the Australian industry’s domestic sales volume, revised since the date of application to include all sales data up to December 2013, and data from ACBPS’ import database. Figure 1 shows the results from the Commission’s analysis.

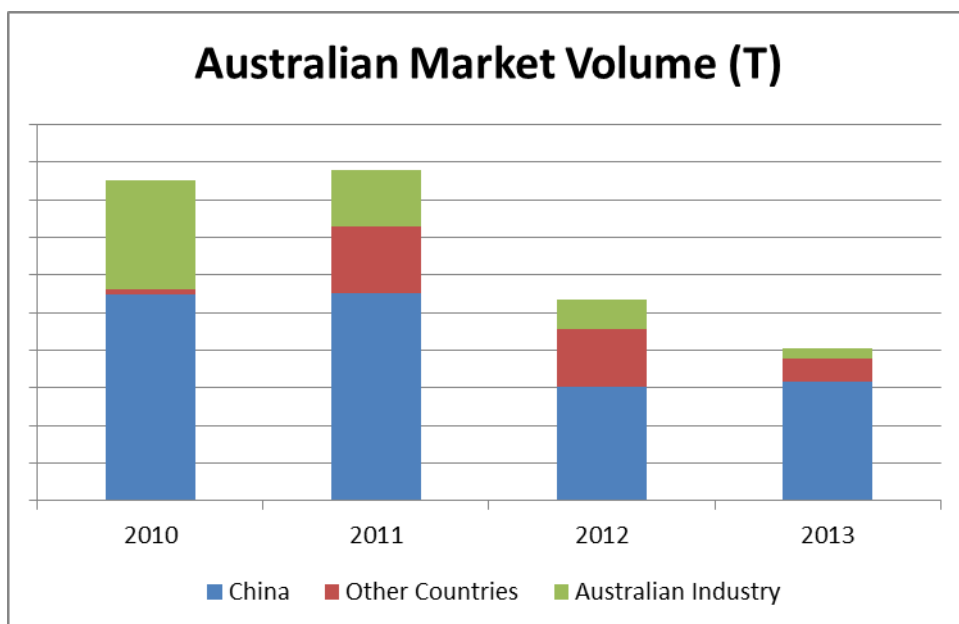


Figure 1 Australian market volume (T) by calendar year



## PUBLIC RECORD

This graph indicates that in 2011 the volume of imported silicon metal increased at the expense of the Australian industry growth. Whilst there has been an overall decrease in the size of the silicon metal market, Simcoa has not been able to maintain a significant share of the market (see paragraph 8.3).

### 5.6 Employment numbers

Simcoa employs approximately [REDACTED] staff for the production of silicon metal. As the plant runs 24 hours per day, staff are rostered on in 4 shifts per day in the manufacturing plant with additional full time support and safety staff working in the administration area. Seventeen people are rostered on per shift for the furnace operation while 3 people run the charcoal plant at any one time. Simcoa provided a report showing its employee head count and hours worked annually for the years 2005 to 2013 (**confidential attachment 8**).

### 5.7 Annual turnover

Annual turnover in 2013 for silicon metal was \$ [REDACTED] million which is a [REDACTED]% increase from the year before and approximately [REDACTED]% increase on the turnover achieved in 2010, being the commencement of the injury analysis period. More than [REDACTED]% of Simcoa's annual GUC turnover is derived from export sales.

### 5.8 Capacity

Annual capacity is [REDACTED] tonnes. The plant has been running close to capacity over the injury analysis period. Simcoa advised that whilst the initial application included a claim for reduced capacity utilisation, there is no claim of injury in the form of reduced capacity utilisation based on the revised 2013 capacity data provided (**confidential attachment 9**).

In 2012 Simcoa increased its capacity by [REDACTED]% through the installation of an additional furnace.

## 6 SALES

### 6.1 General

The A4 spreadsheets provided by Simcoa included a line by line listing of all domestic and export sales of silicon metal. This information included the customer name, invoice number, quantity, invoice value, invoice currency and exchange rate. Apart from exports to New Zealand, export sales were either expressed in US dollars or euros. Simcoa identified all its export customers. We reviewed these customers and are satisfied that none are Australian customers.

### 6.2 Marketing and distribution

The lead time between production and shipment to the customer is approximately 10 days. Simcoa reviews production levels on a weekly basis. Contracts for supply to export customers are generally negotiated once per year around September. At this time the supply price of the silicon metal is negotiated and set for the following year. Contracts do not [REDACTED]. The contract sets [REDACTED] [contract details] Simcoa also provides spot price supplies as requested throughout the year by customers given there is availability of product.

Prices are negotiated based on consideration of world silicon metal prices, production costs and foreign exchange rates. When examining the sales data we observed that unit sales prices to European countries were lower than any other. Simcoa explained that sales to European countries were mostly conducted through traders. Because traders need to achieve some margin for themselves and pay distribution costs before selling to the end user, they require much lower prices from Simcoa.

The delivery terms for most of Simcoa's customers is cost, insurance and freight (CIF), although some customers purchase ex-factory. The goods are either delivered by road or sea.

There is no substantive distributor network for silicon, rather Simcoa sells directly to end-users (be it via its sister companies).

### 6.3 Domestic Sales

Simcoa advised that most of the silicon metal sold domestically is primary use grade. Price is usually set yearly [REDACTED] [pricing details]. Sales of silicon metal are price sensitive based on global supply and demand levels. Whilst there are differences of price depending on the grade of silicon metal, it is supply and demand that determine the major variances over time. Customers can also request specific packing types and sizes and this will also alter the price quoted for the same grade of product.

Previously Simcoa dealt directly with its individual domestic customer's sourcing departments. Prior to 2007 companies entered annual contracts for supply. After 2007 annual contracts ceased and sales became based on spot price negotiations. A shift to consolidation of procurement functions of related entities has meant that Simcoa no longer deals with many of the individual plants it used to. Most big companies now have a specialised procurement officer, often based overseas, and they are the ones that

contact Simcoa for supply when it is required. There is no longer an ongoing commercial relationship with individual plants for supply.

#### **6.4 Export Sales**

Simcoa uses international relationships to facilitate international sales. Simcoa utilise [redacted] [company details] to make sales to the USA because it does not have an import licence in its own right. Simcoa uses [redacted] [company] sales people and office staff to coordinate sales and pays [redacted] [company] a commission of [redacted] for sales-related services and administrative services such as invoicing and financial transactions. A warehousing company is used to unpack and deliver the goods to the US customers.

Simcoa's preference is to deal directly with the customer, but in some markets this is not always possible. In Europe, as noted above, sales are often conducted through a trader or intermediary. Simcoa noted that this negatively effects FOB prices. In addition there is a 6% import duty for sales into the European market, which makes Simcoa less competitive with domestic EU producers.

Simcoa's supply strategy to the overseas market is to provide a [redacted] product combined with [redacted] [supply terms]. Simcoa differentiate themselves from Chinese suppliers by being able to produce higher quality grades that are more difficult to produce, reliability and repeatability.

#### **6.5 Verification of domestic sales data to source documents**

In its application Simcoa provided purchase orders, invoices, dispatch documents, remittance advices and proof of payment for 18 sales to a major domestic customer. We verified these transactions to Appendix A4. No discrepancies were found.

We selected another three customers and reviewed the orders, invoices and remittance advices during the verification visit. We also obtained remittance advices in respect of some of these transactions. We verified the information to the sales listing provided.

Simcoa provided evidence of the unit packing cost provided in the A4 spreadsheet (**confidential attachment 16**) together with copies of monthly domestic freight invoices (**confidential attachment 17**) which were used as the basis for freight costs recorded in A4. We observed some discrepancies between the freight and packing costs. The revised data provided for October to December 2013 had not been properly completed. We discussed this with the company and amended the A4 data to reflect the evidence provided at the verification visit.

We are satisfied that the sales data at Appendices A4 and A6 to the application is relevant, complete and accurate.

#### **6.6 Discounts and rebates**

Simcoa does not offer discounts or rebates on domestic or export sales of silicon metal. Examination of the selected documentation and data confirmed this.

## **6.7 Verification of sales data to audited financial statements**

To assess sales data for completeness and relevance, verification to Simcoa's management accounts was undertaken because audited 2013 financial statements were not yet available. Simcoa confirmed that it would provide the audited financial statements as soon as they became available so the management account details could be cross matched and confirmed.

Simcoa provided a general ledger detail print out of all sales revenue accounts for 2013. (**confidential attachment 6**). We were able to match the data contained within these ledgers to both the Australian sales and total sales of the GUC provided in A4 and A6 appendices.

Simcoa also provided a summary of its total sales of all products separating totals for by-product sales (**confidential attachment 5**). We were able to match these figures to appendix A3 provided in the application.

### **6.7.1 Export sales**

Simcoa indicated that it exported █████ tonnes of silicon metal during 2013. Export sales accounted for █% of Simcoa's total sales turnover and volume.

The Commission examined copies of export sales documentation and cross matched the data with the information provided in appendix A4 of the application for export sales. We found one minor discrepancy for one shipment in the total recorded for ocean freight. All other figures examined were accurate and we consider the discrepancy to be immaterial. We collected copies of particular shipment documents (**confidential attachment 18**).

### **6.7.2 Completeness and relevance of sales data – conclusion**

We consider that Simcoa's domestic sales in Appendix A4, is a complete, relevant and accurate reflection of the sales of silicon metal during the investigation period.

Accordingly, we consider the Simcoa's sales data is suitable for analysing the economic performance of its silicon metal operations from 1 January 2010 to 31 December 2013.

## 7 COST TO MAKE AND SELL

### 7.1 Verification of cost to make and sell data to management reports

Simcoa allocated the cost of goods sold to domestic and export sales using sales volumes. It also used this method to allocate administration and marketing expenses. Simcoa allocated certain selling expenses only to export sales (such as ocean freight and export insurance), only to domestic sales (such as freight for Australian deliveries) or to both using sales volumes (such as pallets and freight to Fremantle). We note that the use of sales volume, rather than sales revenue, to allocate administration, marketing and selling expenses has no material effect on the analysis.

Simcoa provided a soft copy of the data downloaded from its accounting system to construct the A6 appendices and allocation of costs. It demonstrated how costs had been selected for inclusion in the different markets and categories.

We began by cross matching the total cost of goods manufactured to the management report. We found that the total recorded in the combined domestic and export A6 was understated by approximately \$[REDACTED]. Simcoa explained that this variance was due to the exclusion of a figure for an inventory movement between Simcoa and its subsidiary, Microsilica, which was recorded in the management report but was not reflected in the A6 figures. After examination of the figures, we were satisfied that this amount was correctly excluded from the A6 figures.

When we examined the individual cost categories on the A6 appendix we were able to match each total to the management report, detecting only one minor variance in administration costs which Simcoa explained was due to an amount for bad and doubtful debts being excluded. The discrepancy equated to less than 0.01% of the total administration cost.

### 7.2 Production volumes

Simcoa explained that the CPR inventory system produces daily production sheets. Actual production is calculated as part of a formula. The formula is as follows:

Opening stock + production – sales = closing stock

A stocktake is performed at the end of every month of product contained within each storage bunker. The above formula is manipulated in order to calculate the actual production using the known factors. Simcoa is able to confirm the opening and closing stock figures via its monthly stocktakes, it is also knows accurate sales figures for each month therefore calculation of production becomes:

Closing stock + sales – opening stock = production

This calculation is then factored into the system to produce a monthly production report. Simcoa provided copies of the monthly production reports for the months July to September 2013 (**confidential attachment 4**). Simcoa noted this formula is generally accurate to about + or – 20 tonnes. We compared the production reports for the September 2013 quarter to the production figures provided in A6. We noted a variance of

less than 1% in the totals, and were satisfied that the production figures provided in the application are relevant and accurate.

### **7.3 Raw materials**

Simcoa advised that raw material supply contracts are based on multi year terms. Electrodes are purchased on an annual basis and inputs are set annually.

For each of the raw material categories (local, imported, charcoal and quartz) we selected three specific transactions from the general ledger detail report for the month of September 2013 to trace to source documents. Raw material represented approximately █% of the total cost of goods sold.

We verified the selected entries to source documents. Documents supporting the verification are at **confidential attachments 12**. These documents include supplier invoices, internal worksheets and journal entries.

#### **7.3.1 Raw materials – local**

When we examined the individual general ledgers the category ‘raw materials – local’ included costs for charcoal retort maintenance, consumables, lubricants, electrodes, aluminium, limestone, electricity and wood chips.

#### **7.3.2 Raw materials – imported**

The raw material – imported category included costs for imported charcoal from █, coal, █ [source] electrodes and electrodes imported from other countries, remelt which is imported silicon used for cooling in the manufacturing process, core and paste electrode expenses.

#### **7.3.3 Raw materials – charcoal**

Costs included in this category covered all components in the manufacturing process to make charcoal. Costs included items such as dry logs, electricity, saw blades, lubricants, green blocks and maintenance. Simcoa explained that this term referred to fresh trees sourced from the clearing of wood at local bauxite mine sites. Green blocks turn to dry blocks several weeks after collection.

#### **7.3.4 Raw materials - quartz**

When examining quartz we verified that the total amount recorded was made up of payments to the contractor that mined the quartz, freight and royalties paid to the government and land owner. These represented costs associated with obtaining the quartz from the local mine.

### **7.4 Overheads**

We selected three fixed overhead account codes and two variable account codes to examine in detail. The accounts selected were as follows:

## PUBLIC RECORD

Fixed:	Salaries
	Other costs
	Mobile plant recovery
Variable:	Refining oxygen
	Furnace tapping shotgun shells

From each of these accounts we selected a specific transaction from the month of September 2013 and obtained supporting source documentation. For the salaries account Simcoa provided a copy of the monthly payroll allocation summary confirming the amount recorded in the general ledger for the month. (**confidential attachment 12A**). Simcoa was able to supply documents to support all amounts selected.

### 7.5 Depreciation

Simcoa depreciates on a provisional basis from January to November and makes any adjustments in December for differences between actual and provisional depreciation. Simcoa provided copies of its depreciation schedule for the 2013 year (**confidential attachment 14**) together with its 2013 asset register listing all new asset purchases for the 2013 year (**confidential attachment 13**). We observed there were no differences between the depreciation expense provided in A6 and the 2013 management reports.

### 7.6 By products

When completing appendix A6, Simcoa only included sales of silicon metal in the revenue figures. In the summary of total income (**confidential attachment 5**) there is an additional \$[REDACTED] dollars of revenue for the 2013 year obtained from the sale of by-products and fume sales. Simcoa advised that sales of silica fume are recorded by its subsidiary company, Microsilica. Because the sale of these products is a direct result of the production of silicon metal, we have amended appendix A6 to include these items for each of the years in the injury analysis period. The additional revenue has been offset against the manufacturing costs and has been allocated on the same basis as Simcoa allocated costs, that is, based on sales volume for domestic versus export allocation.

### 7.7 Verification of selling, general and administration costs to source documents

To assess selling, general and administration (SG&A) cost data for accuracy, verification to source documents was undertaken together with upwards verification to the financial statements. We were able to match all categories of SG&A costs to the management reports. SG&A costs represent [REDACTED]% of total cost to make and sell (CTMS) for domestic sales.

#### 7.7.1 Selling

Simcoa's selling expenses covered numerous categories of marketing items recorded in separate general ledger accounts. These selling expenses were allocated based on sales volume proportions between domestic and export sales in the A6 appendix. Selling costs represented [REDACTED]% of total SG&A and [REDACTED]% of total CTMS for domestic sales.

### **7.7.2 Distribution**

Simcoa demonstrated how it allocated the different distribution costs between domestic and export sales. Certain general ledger codes such as ocean freight and commissions paid to overseas distributors were fully allocated to export sales, while other freight and packing required for shipping was allocated across the domestic and export sales on the same basis as all other costs, being sales volume.

During 2013 distribution costs equated to \$ [REDACTED] per tonne for domestic sales and \$ [REDACTED] per tonne for export sales.

### **7.7.3 Administration**

Administration costs account for [REDACTED]% of total CTMS for domestic sales and include expenses such as site, security and safety costs. We reviewed the totals included for both domestic and exports sales and are satisfied they have been allocated correctly.

## **7.8 Costs to make and sell – conclusion**

We consider that Simcoa's cost to make and sell data in Appendix A6, as amended, is a reasonably complete, relevant and accurate reflection of the actual costs to manufacture and sell silicon metal during the period from 1 January 2013 to 31 December 2013.

Accordingly, we consider the Simcoa cost to make and sell data provided in Appendix A6 is suitable for analysing the economic performance of its silicon metal operations from 1 January 2013 to 31 December 2013.



## 8 ECONOMIC CONDITION

### 8.1 Applicant's injury claims

Simcoa alleges it has suffered material injury caused by silicon metal exported to Australia from China at dumped and subsidised prices.

Simcoa claims it has been injured through:

- Lost sales volumes;
- Reduced market share;
- Price depression;
- Price suppression;
- Loss of profits and profitability; and
- Reduced return on investment

Reduced capacity utilisation was claimed in the application; however after updating the 2013 capacity data to include the period October to December 2013, Simcoa acknowledges that it is operating at full capacity and therefore reduced capacity utilisation is no longer a claim.

### 8.2 Commencement of injury, and analysis period

Simcoa indicated that injury has been occurring since the previous anti-dumping measures ceased in 2010.

### 8.3 Volume and market share trends

The following graph shows Simcoa's domestic sales volumes for silicon metal for calendar years 2010 to 2013.

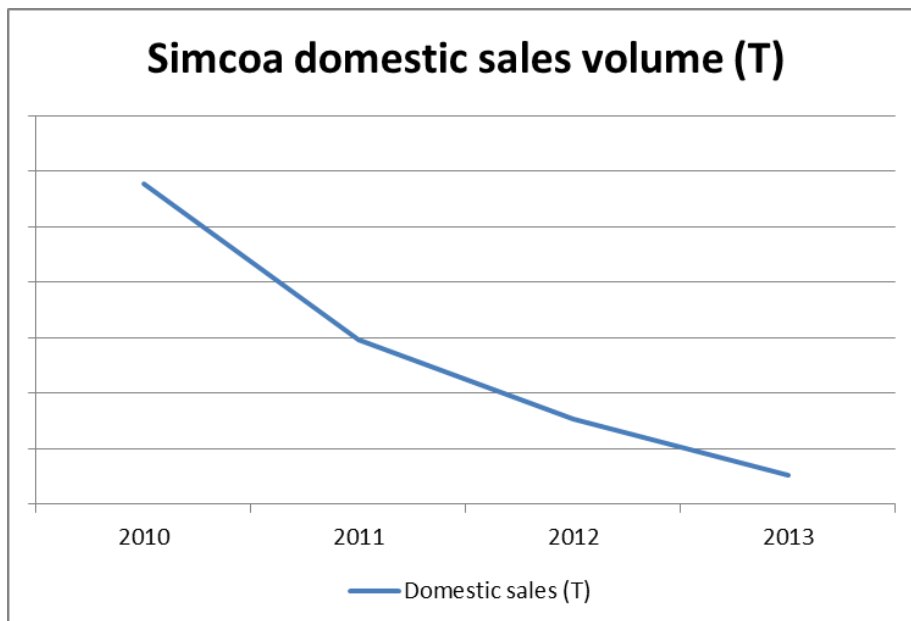


Figure 2 Simcoa's domestic sales volumes (T) over the injury analysis period

Figure 2 shows that Simcoa’s domestic sales volume of silicon metal has decreased consistently over the injury analysis period.

Figure 3 demonstrates the decreasing Australian industry market share.

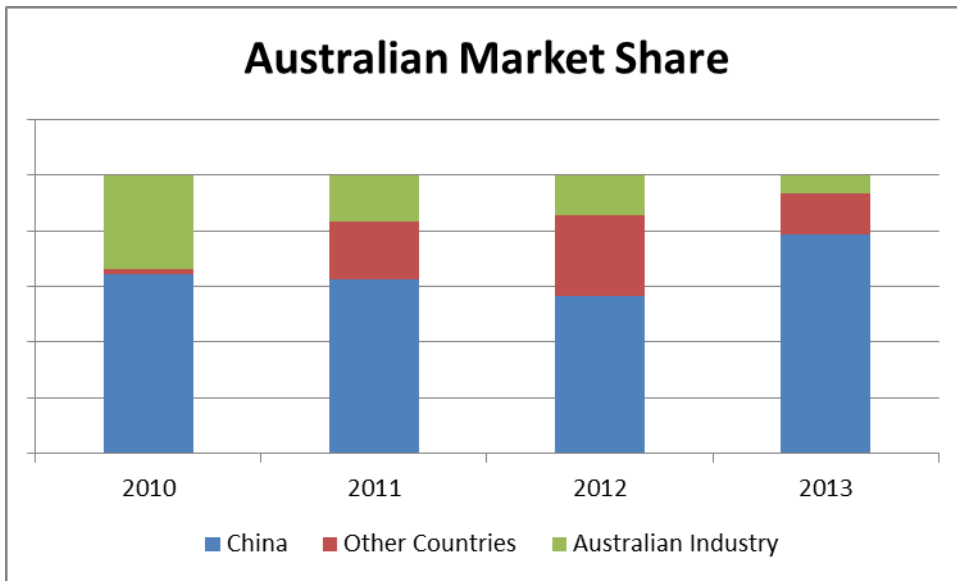


Figure 3 Australian volume market share (T) by calendar year

The share of the market occupied by imports has consistently increased over the injury analysis period to the detriment of the Australian industry. China specifically held a consistent share from 2010 to 2011 and then lost a portion of its market share during 2012 to imports from other countries. However in 2013 China regained those losses, and further increased its market share at the expense of both imports from other countries and the Australian industry. China increased its market share by █% over the injury analysis period whilst the Australian industry’s share dropped by █%. Simcoa advised that they believe that some of the imports from “other countries” are likely to be Chinese exports that have been transhipped via another country. We are unable to verify this claim at this stage of the investigation.

#### 8.4 Price suppression and depression

Price depression occurs when there is a reduction in prices. Price suppression occurs when price increases for the applicant’s product, which otherwise would have occurred, have been prevented. An indicator of price suppression may be the margin between revenues and costs.

The following graphs show the movements and relationships of Simcoa’s net revenue and cost to make and sell (CTMS) for domestic silicon metal sales from CY 2010 to 2013. The first graph depicts total domestic net revenues and total CTMS for domestic sales, while the second shows unit prices and unit CTMS.

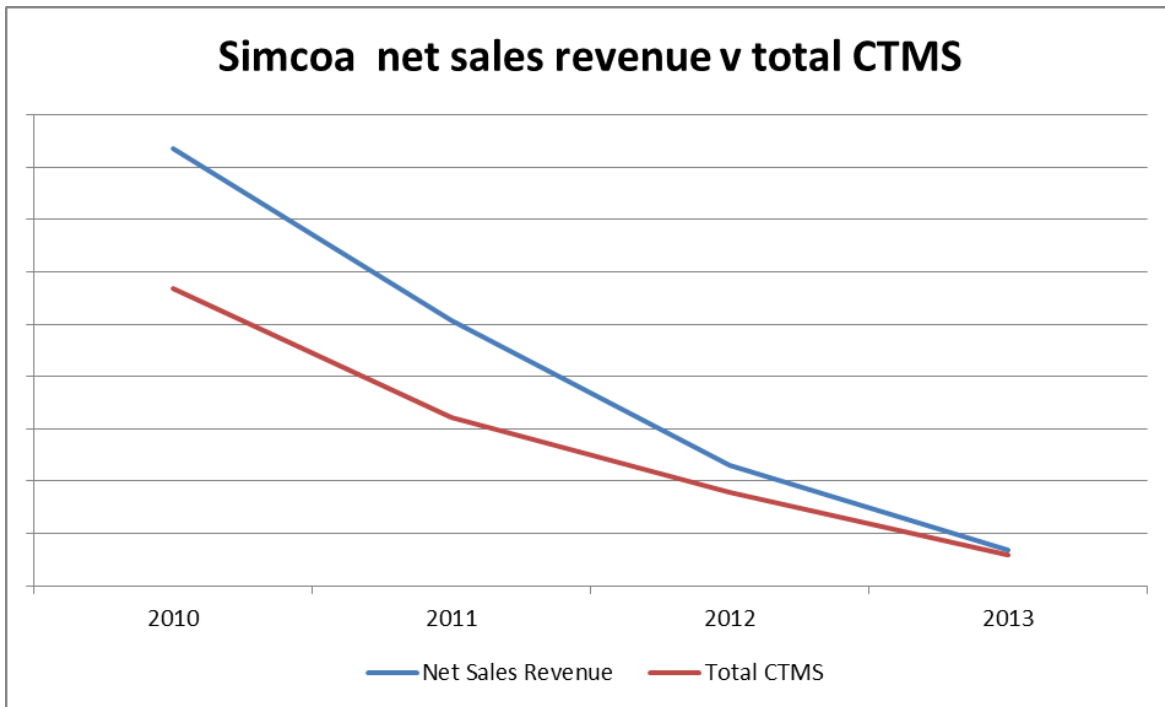


Figure 4: Simcoa domestic net sales revenue v total CTMS for domestically sold goods

Figure 4 shows an overall decline in both domestic sales revenue and CTMS for domestically sold goods. The margin between the two figures has also decreased to a point where they almost align during the investigation period.

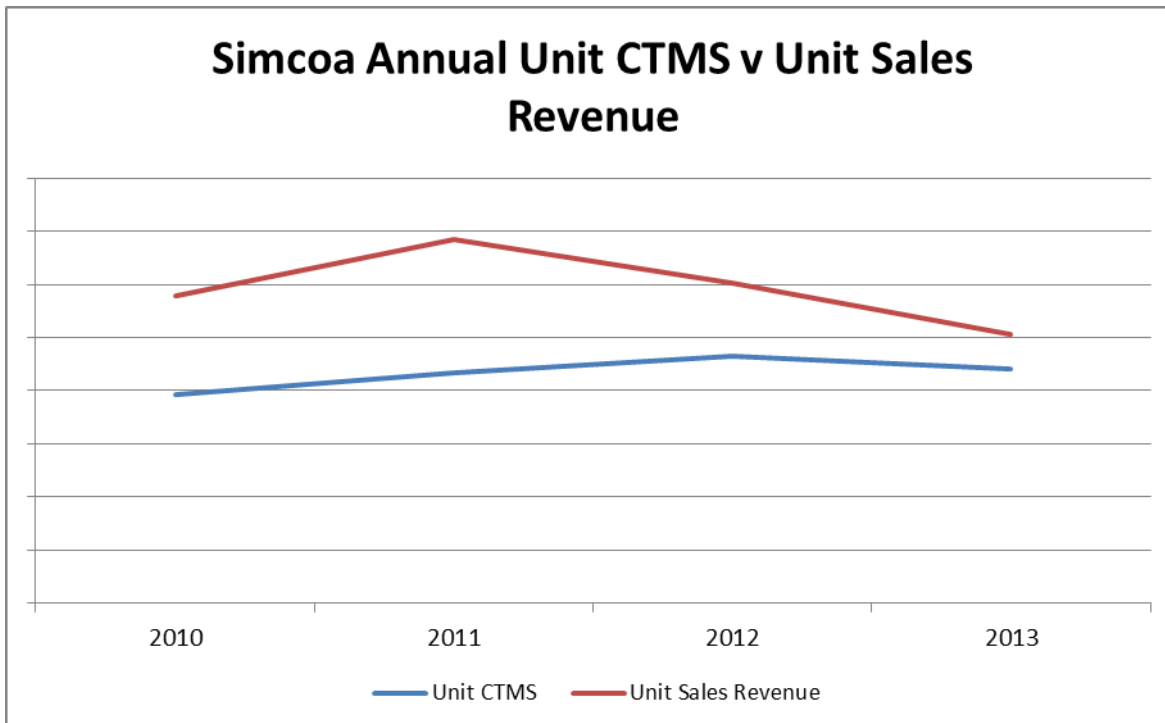


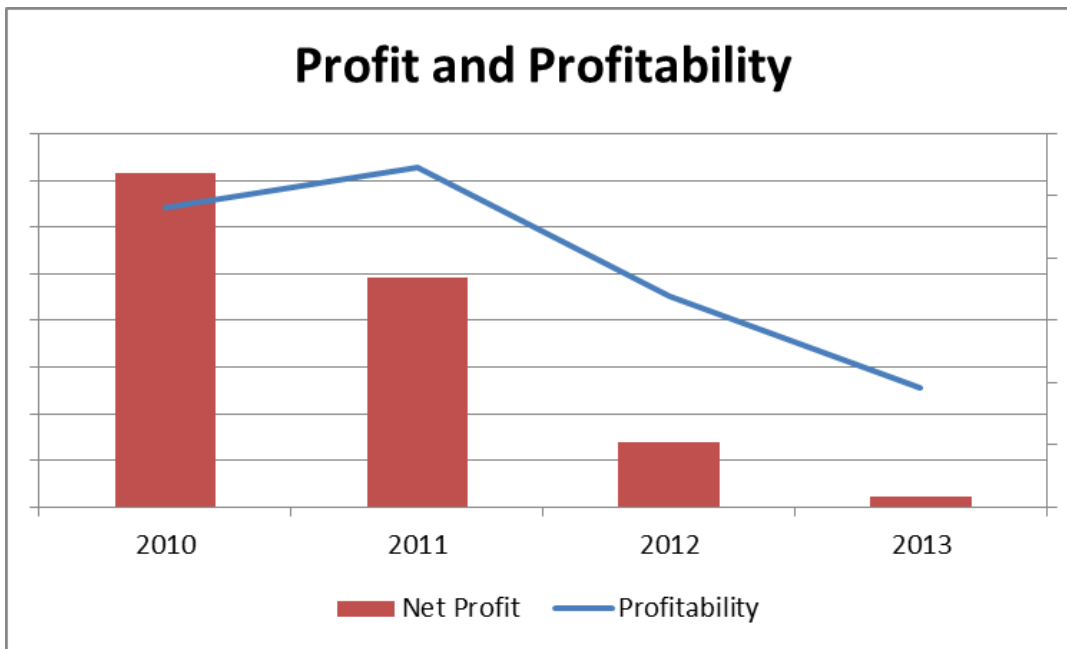
Figure 5: Simcoa domestic unit CTMS v domestic unit sales revenue

Figure 5 indicates price suppression occurring during the period 2011 to 2012 as unit CTMS increases, the unit sales revenue decreases. During the investigation period unit sales revenue continues to decrease while unit CTMS also begins to decline at a lesser rate than the unit sales revenue as the margin between the two figures narrows over the investigation period.

Figures 4 and 5 support Simcoa’s claims of price depression and price suppression at this stage of the investigation.

### **8.5 Profits and profitability**

The following graph shows movements in Simcoa’s total profits and profitability (profits measured as a percentage of revenue) for silicon metal from CY 2010 to 2013.



**Figure 6:** Simcoa’s domestic net profit v domestic profitability

Figure 6 shows the declining domestic net profits of Simcoa over the injury analysis period. Simcoa experienced a period of increased profitability during 2011 after which time profitability also decreased to 2013.

### **8.6 Other economic factors**

Simcoa completed an Appendix A7 for silicon metal for calendar years 2010 to 2013. It included figures incorporating all operations of the company, including domestic and export sales of the goods and by-products.

#### Assets

Simcoa indicated the value of assets in the production of silicon metal more than doubled over the injury analysis period. This is due to the expansion of the number of furnaces and the installation of a new crushing plant.

### Capital investment

Simcoa indicated the value of capital investment in the production of silicon metal initially increased in 2011 but then steadily decreased over 2012 and 2013. Overall capital investment decreased by 22% since 2010.

This overall reduction indicates injury in the form of reduced capital investment.

### Revenue

Revenue from silicon metal increased overall from 2010 to 2013. However revenue from domestic sales reduced over that period while revenue from export sales increased.

### Capacity

The production capacity in relation to silicon metal increased over the period. This is due to the installation of an additional furnace in 2012.

### Capacity utilisation

Simcoa's A7 response shows that it was manufacturing at full capacity over the injury analysis period, therefore there is no basis for a claim of reduced capacity utilisation.

### Employment

Employment numbers increased by approximately ■% over the injury analysis period. Running an additional furnace 24 hours per day has required an additional number of staff to be employed to meet demand.

### Stocks

Stock levels have fluctuated over the injury analysis period, and have approximately doubled in 2013. However, the total closing stock at the end of each year has not been excessive.

## **8.7 Conclusion**

Based on an analysis of the information obtained and verified during our visit, we consider that the company has experienced injury in the form of:

- loss of sales volume;
- reduced market share;
- reduced revenue;
- price suppression;
- price depression;
- reduced profits;
- reduced profitability.

## 9 CAUSAL LINK

We discussed with Simcoa whether the alleged dumping and subsidisation of imported silicon metal can be demonstrated to be causing material injury to the Australian industry.

### 9.1 Price effects

When Simcoa began producing silicon metal it supplied 100% of the primary use domestic market to customers such as [REDACTED]. At that time China could not produce a grade of silicon metal suitable for primary users. Simcoa stated that in approximately 2004 or 2005 China improved the grades of silicon metal it was producing at a cheap price and as a result, [REDACTED] started requesting cheaper prices from Simcoa. Simcoa had been dealing with [REDACTED] for approximately 18 years and had an established relationship it had worked to build through high levels of cooperation. However, Simcoa were unable to match the prices being requested by [REDACTED] based upon the offers from China.

For quite some time world silicon metal prices were depressed. In 2007 there was a shift in the world price for silicon metal. Silicon metal prices increased while prices for aluminium dropped. It was at this time the method of buying changed according to Simcoa. Prior to that contracts were established on an annual basis with a set price based on published price guides plus a premium and incorporation of cost and freight. Around 2007 Simcoa's domestic customers started establishing offices overseas and procurement became centralised. Chinese prices at this time were cheap, however there were issues with supply at times. Most domestic customers began dual sourcing and continued to source from both Simcoa and Chinese suppliers for some time. As supply has become more reliable from China and Chinese prices continued to be cheaper than those offered by Simcoa, customers have shifted from dual sourcing to no longer purchasing silicon metal from Simcoa.

Simcoa advised that in 2012 it offered locally produced silicon metal for supply to the largest Australian customer. The prices offered were substantially below Simcoa's prevailing prices for silicon metal. Simcoa was advised that its orders were not required. Simcoa believes supply had been secured from Chinese sources at prices that undercut those of Simcoa, even though it had offered a reduced rate. Simcoa provided evidence in its application of the supply negotiations it had with [REDACTED] in 2012. This evidence provides details of price negotiations that took place between the two companies, however the negotiations never resulted in an order being placed. Evidence was also provided of price negotiations that took place during 2010 with the same company, where again the result was no order being placed.

### 9.2 Volume effects

Simcoa indicated that the falling sales volumes it has experienced is a reflection of the increase in cheaper priced imported goods being obtained by the Australian end users of silicon metal instead of sourcing Simcoa products.

Even though the overall domestic market size for silicon metal has decreased over the injury analysis period, Simcoa's share of that market has substantially decreased to a point where domestic sales now only account for [REDACTED]% of the company's total turnover.

Simcoa provided evidence of its annual sales volumes by customer for the calendar years 1991 to 2013 (**confidential attachment 3**). This evidence shows the declining sales volumes over the injury analysis period down to zero volumes in the 2013 calendar year for many domestic customers that were historically a major source of income for Simcoa.

Initially Simcoa lost market share to imports from countries other than China, however the proportion of imports occupied by other countries has reduced and been taken over by imported products from China. China has taken over other country's share of imports in addition to Simcoa's share of the market (see Figure 3 of this report).

Given Simcoa is currently operating at full capacity, it noted that if it were able to regain domestic sales business it would sacrifice sales to the export market to service the domestic demand. Simcoa's preference is to sell silicon metal to the domestic market, however, its ability to do this is being restricted by the presence of allegedly dumped and subsidised silicon metal from China.

### **9.3 Factors other than dumping**

Simcoa noted that the exchange rate of the Australian dollar is a crucial factor in profitability of sales to the export market, a shift in the exchange rate can have negative effects on individual export sales. Domestic sales are preferred in order to remove this element of instability. The exchange rate also affects the demand for the goods to the export market and Australian importer's sourcing decisions.

Simcoa admit that the global financial crisis (GFC) in 2009 resulted in market volumes decreasing overall, however, Simcoa considered that despite the contracting market size at that time, it maintained satisfactory levels of sales and market share.

Simcoa has been forced to shift its market from domestic sales to export sales just to move stock levels and maintain function.

## **10 UNSUPPRESSED SELLING PRICE**

Simcoa advised the Commission that it would provide a response at a later date with regard to the most appropriate method to calculate the USP.



## **11 GENERAL COMMENTS**

The Commission asked why Simcoa did not apply for a continuation when measures previously in place, expired in February 2010. Simcoa advised that at the time it was experiencing a “boom” period and did not think it had sufficient grounds to demonstrate injury to warrant a continuation of measures. After the measures expired however, negative effects from the GFC combined with an increase of imports from China caused Simcoa to decide to lodge a new application for measures.

The issue of the duty drawback provision was also discussed, whereby any duty paid for goods imported which are then used in the production of another product which is exported, can be claimed back. The effect of this would essentially be to negate any benefit obtained by the imposition of measures where importers use the goods in the production of things they then export. Simcoa expressed concern about this possibility, however did not believe it was an issue last time measures were imposed. Consideration of duty drawback will be something to be further considered by the Commission after meetings with importers.

Simcoa acknowledges that if it is unable to recover sales to the domestic market it will continue to expand its export sales. However, Simcoa’s preference is to supply the Australian market and will sacrifice sales to export markets to do so.

**12 APPENDICES AND ATTACHMENTS**

<b>Confidential Attachment 1</b>	Simcoa silicon metal production and uses brochure
<b>Confidential Attachment 2</b>	Map of manufacturing plant
<b>Confidential Attachment 3</b>	Simcoa customer sales quantity by region and by year 1991 to 2013
<b>Confidential Attachment 4</b>	Monthly production reports for July to September 2013
<b>Confidential Attachment 5</b>	Revenue summary by calendar year, 2010 to 2013, separating revenue sources
<b>Confidential Attachment 6</b>	General ledger sales detail report
<b>Confidential Attachment 7</b>	Profit & loss statement – unaudited management report
<b>Confidential Attachment 8</b>	Employee numbers
<b>Confidential Attachment 9</b>	Updated appendix A7
<b>Confidential Attachment 10</b>	Silicon grade technical specification sheet
<b>Confidential Attachment 12A</b>	Overhead source documents
<b>Confidential Attachment 12</b>	Raw material source documents
<b>Confidential Attachment 13</b>	2013 asset register – new assets purchased
<b>Confidential Attachment 14</b>	2013 annual depreciation expense summary
<b>Confidential Attachment 15</b>	Inventory ledger and movement records
<b>Confidential Attachment 16</b>	Monthly packing cost documents
<b>Confidential Attachment 17</b>	Domestic freight invoices
<b>Confidential Attachment 18</b>	Exporter source documents – invoices
<b>Confidential Attachment 19</b>	██████████ publication