

Non-confidential

Email

19 May 2016

Mr George Katsoulis
Anti-Dumping Commission
Level 35
55 Collins Street
Melbourne VIC 3000
george.katsoulis@adcommission.gov.au

Dear Mr Katsoulis

**Guardian Industries Corp Ltd
Clear Float Glass exported from China, Indonesia and Thailand (Continuation Inquiry No. 335)**

We act for Guardian Industries Corp Ltd. We refer to the Australian Anti-Dumping Commission (**ADC**) investigation into clear float glass (**CFG**) products exported from the People's Republic of China (**China**), the Republic of Indonesia (**Indonesia**) and the Kingdom of Thailand (**Thailand**) following an application lodged by CSR Viridian Ltd (**Applicant**).

This letter is a preliminary submission in relation to the above-captioned continuation inquiry. The purpose of the submission is to respond to the application lodged by the Applicant and to demonstrate that the Commissioner of the ADC (**Commissioner**) should recommend to the Minister under s 269ZHF of the *Customs Act 1901* (Cth) (**Act**) that anti-dumping measures cease in respect of CFG.

1. Executive summary

1.1 Our client submits that, even if the Commissioner considers that our client has imported CFG to Australia at dumped prices (which is denied), he cannot be satisfied that:

- (a) dumping is likely to recur (see section 4);
- (b) if dumping is likely to recur, it is likely to cause material injury to the Applicant (see section 5); and
- (c) if dumping is likely to recur, our client's dumping will not be negligible (see section 6).

1.2 Accordingly, the Commissioner ought to recommend that the anti-dumping measures be allowed to expire. Alternatively, he should recommend that the notice cease to apply to our client pursuant to s 269ZHF(1)(a)(ii) of the Act (see section 7).

2. Requirements of s 269ZHF(2) of the Act

2.1 The Act prohibits the Commissioner from recommending to the Minister that anti-dumping measures be continued unless "*the Commissioner is satisfied that the expiration of the measures would lead, or would be likely to lead, to a continuation of, or a recurrence of, the dumping or subsidisation and the material injury that the anti-dumping measure is intended to prevent*": s 269ZHF(2) of the Act.

2.2 The Commissioner must be satisfied that the expiration of the anti-dumping measures would lead, or would be *likely* to lead, to a continuation or recurrence of the dumping and the associated material injury. In our client's submission, as a matter of Australian law, the

meaning of the word "*likely*" in s 269ZHF(2) is "*more than a 50 percent chance*" or "*more probable than not*".¹ Moreover, the WTO appellate body has held that "*likely*" in this context means nothing less than "*probable*".² That ruling should be afforded "*substantial weight*" in anti-dumping law.³ It follows that the Commissioner cannot be satisfied under s 269ZHF(2) if there is only a chance or possibility that the dumping will continue or recur.

- 2.3 Notably, the application alleges that, if measures are allowed to expire, import volumes and associated dumping "*could possibly increase*" and "*[t]he consequent price pressure on Viridian could see a loss of revenue and a loss of volume*".⁴ The likelihood of both recurrence of dumping and material injury are expressed to be a mere possibility rather than a probability.
- 2.4 The Commissioner's satisfaction must be arrived at reasonably, with reference to all relevant considerations, and without taking into account any irrelevant considerations. The nature and quality of the material relied on by the Commissioner in reaching that satisfaction must be sufficient to support any relevant findings of fact. In particular, the Commissioner's satisfaction under s 269ZHF(2) is conditioned upon the likelihood of events which may occur in the future. It follows that there is an inherently speculative element to the Commissioner's task. Accordingly, in our client's submission, the Commissioner must be satisfied on the basis of substantial and probative material that it is *probable* that those future events will occur. The Applicant's contentions, being ones of possibility rather than probability, do not support the requisite state of satisfaction for s 269ZHF(2). The Commissioner ought not recommend that measures continue on the basis of the material currently before him.
- 2.5 Finally, the Commissioner's reasonable satisfaction cannot be arrived at without having regard to the nature and consequences of the alleged dumping. The Commissioner should have regard to the seriousness of the allegations of dumping; the inherent unlikelihood of the alleged future dumping; and the gravity of the consequences to our client if a recommendation is made by the Commissioner that anti-dumping measures be continued. Our client submits that all of those matters weigh against a finding that dumping is likely to continue or recur in the future. The Commissioner should not lightly make such a finding.

3. The application

3.1 The application asserts in relation to our client and Thailand that:

- (a) Thailand has excess production capacity or our client has excess production capacity;⁵
- (b) Thai 3–12mm CFG import volumes by area are stable and are forecast to decrease;⁶ and
- (c) our client has distribution links in Australia.⁷

¹ See *Australian Securities Commission v Nomura International PLC* (1998) 89 FCR 301 at 396.

² *United States — Sunset Reviews of Anti-Dumping Measures on Oil Country Tubular Goods from Argentina* (AB-2004-4) at [75]–[77].

³ *Siam Polyethylene Co Ltd v Minister of State for Home Affairs* [2009] FCA 837 at [66].

⁴ At p 9.

⁵ Application at pp 6, 9.

⁶ Application at p 8.

⁷ Application at p 9.

3.2 The proposition in 3.1(b) is true. The propositions in 3.1(a) and 3.1(c) are false. This is a matter of common market knowledge.

3.3 The application contends that if the anti-dumping measures expire, it is likely that dumping will recur⁸ and material injury will result.⁹ These contentions are addressed at sections 4 and 5 respectively.

4. **Dumping is not likely to recur**

4.1 Our client has not dumped CFG during the relevant period from 1 January 2015 to 31 December 2015, or at any other time since anti-dumping measures were imposed. The Commissioner's inquiry therefore only concerns whether dumping will recur, and not whether dumping will continue. The Commissioner cannot recommend continuation of anti-dumping measures unless dumping is likely to recur: s 269ZHF(2) of the Act.


4.2 Dumping is unlikely to recur because the global primary production overcapacity which existed until 2009, and which is alleged in the application to still exist,¹⁰ no longer exists. The Commissioner is bound to make his decision on the most current material available to him.¹¹ In particular, our client notes that the Applicant refers to statistics in a European Chamber of Commerce study. The study demonstrates that, contrary to the thrust of the Applicant's submission, there has been a 6% decrease in active Chinese production lines over the 2013–2015 period, despite increasing global demand.¹²

4.3 Alternatively, dumping by our client is unlikely to recur because:

(a) our client's imports have been low in volume, and targeted only to service a set of established customers where it is profitable to do so;

(b)  Business program and investments

(c)  Pricing issues

 Our client has focused on generating profit on cost rather than volume; and

⁸ At pp 6–9.

⁹ At p 9.

¹⁰ At p 6.

¹¹ *Minister for Aboriginal Affairs v Peko-Wallsend Ltd* (1986) 162 CLR 24 at 44–45 per Mason J (Gibbs CJ and Dawson J agreeing at 30 and 71 respectively).

¹² Viridian Submission on Market Situation in the People's Republic of China for CFG (April 2016) at [3.4].

¹³ See Attachment D (Confidential).

- (d) demand for CFG in Thailand has grown strongly in line with its GDP growth, which is forecast to remain high for years to come. This has been accompanied by a reduction in the Thai CFG industry's reliance on export markets. [REDACTED]

Pricing issues [REDACTED]

- 4.4 The Applicant apparently asserts that recent increases in CFG export volume from China, Indonesia and Thailand suggest that dumping is likely to continue or recur if measures expire.¹⁴ However, increases in total export volume are commensurate with a decline in domestic Australian capacity.¹⁵ They do not represent an attack on Australian industry.

4.5 Sale volumes [REDACTED]

- 4.6 As our client has not dumped CFG, [REDACTED] it is merely speculative to posit that our client will dump CFG in the future.

5. Material injury has not continued and will not recur

- 5.1 The expiration of the anti-dumping measures would not lead, or be likely to lead, to material injury to the Applicant. The Commissioner is therefore prohibited by s 269ZHF(2) of the Act from recommending the continuation of anti-dumping measures.

- 5.2 **First**, imports are unlikely to detract from the Applicant's market share, profits or profitability. Since 2013, imports have supplemented the Applicant's limited primary production capacity in order to service growing domestic demand.

- 5.3 The Applicant has a limited primary production capacity at its single Dandenong float line. The anti-dumping measures have encouraged the Applicant to import CFG produced outside Australia to supplement its inadequate capacity. We estimate that the Applicant services less than two-thirds of the Australian market, not accounting for its New Zealand exports. This is illustrated by the immediate increase in CFG imports triggered by the Applicant's closure of its Ingleburn float line.¹⁶

- 5.4 As the Applicant's domestic production capacity has decreased, Australian consumption of CFG has significantly increased and will continue to increase in the future. This is primarily due to a residential construction boom in capital cities on the eastern coast of Australia.¹⁷ For instance, in the period from the December quarter 2014 to the December quarter 2015, there was a 4.2% increase in the value of building work done, and a 4.6% increase in the number of dwelling units commenced in Australia.¹⁸ There is a corresponding construction boom in New Zealand,¹⁹ to which the Applicant also exports Australian-manufactured CFG.

- 5.5 It follows from the preceding two paragraphs that there is currently a confluence of manufacturing undercapacity and high demand from Australian and New Zealand consumers.

¹⁴ See application at pp 6–8.

¹⁵ See 5.2 to 5.6.

¹⁶ See Attachment A.

¹⁷ See Attachment B.

¹⁸ Australian Bureau of Statistics, 8752.0 - Building Activity, Australia, Dec 2015 (released 13 April 2016).

¹⁹ See Attachment C and the Applicant's annual report at p 10.

The Applicant's reduced production capacity was planned in its 2013 annual report,²⁰ which did not anticipate the subsequent construction boom and accompanying increase in demand for CFG. For these reasons, continued anti-dumping measures will not lead to increased primary production in Australia. They will lead to increased imports from countries or importers not covered by the measures. Imports and future imports service Australia's increasing demand, rather than detracting from the Applicant's existing market share.

5.6 Accordingly, anti-dumping measures will not increase the proportion of CFG which is both produced and consumed in Australia. This militates against a finding that there will be material injury: see s 269TAE(1)(c) of the Act, which qualifies s 269ZHF.²¹

5.7 **Second**, the expiration of measures will not depress or suppress CFG prices, because:

- (a) the Applicant's market share position makes it the de facto price setter, and any variation in price is likely to be driven mostly by the Applicant. The Applicant has not and cannot allege that it is a price taker rather than a price setter - indeed, it enjoys an apparent 8% pricing advantage as a local manufacturer;²²
- (b) to the extent that our client's prices may be lower than the Applicant's, this is attributable to the Applicant's advantages as a domestic producer, for which it can charge a premium. These include shorter lead times, better product mix and more convenient service and delivery options. Thai CFG pricing is explained by that premium.²³ As set out at 5.7(c) and 5.8, our client's prices are profitable and are higher than that of other exporters. They are not depressive or suppressive; and
- (c) the importer with the lowest prices is [REDACTED] is not currently covered by the anti-dumping measures. It is therefore not possible to avoid the actual or potential depressive or suppressive effect of [REDACTED] prices, which we believe are as low as [REDACTED]/metric tonne on all CFG thicknesses, by continuing the existing measures. [REDACTED] 8–12mm CFG, often sold through the Applicant, is priced [REDACTED]. Despite that, [REDACTED] dumping margins were found to be negligible and its prices were said not to influence prevailing market prices. Since then, its decreased prices, increased volume and ingratiation with the Applicant, who is the market leader, are very likely to have depressed or suppressed market prices.

5.8 CFG prices are more likely to be depressed or suppressed if they remain in force in respect of our client. [REDACTED]

Pricing issues

[REDACTED] If anti-dumping measures are continued, exporters not covered by the measures are likely to take advantage of them to sell large volumes in Australia at lower Asia-Pacific prices, causing price depression or suppression.

Pricing issues

²⁰ At p 4.

²¹ *Siam Polyethylene Co Ltd v Minister of State for Home Affairs (No 2)* [2009] FCA 838 at [33]–[34], [55]–[61], successfully appealed in *Minister of State for Home Affairs v Siam Polyethylene Co Ltd* [2010] FCAFC 86, but on other grounds: see [102]–[108].

²² Trade Remedies Branch Report 159C at 9.1.

²³ Termination Report 159B at 8.7.2.

- 5.9 **Third**, although the Applicant may have suffered injury from lost profits or profitability until 2011, the Applicant's increasing profits now dispel any suggestion that the Applicant is suffering or will suffer material injury. The Applicant's annual report for 2015 records a "*significant turnaround in profitability*" as well as increased sale volume and revenue.²⁴ Its application admits that prices have increased despite any alleged dumping.²⁵
- 5.10 **Fourthly**, even if the Applicant will suffer material injury, that injury is or would be caused by "*factor[s] other than the exportation of those goods*". It is therefore not attributable to our client's exports: s 269TAE(2A) of the Act. In particular, any injury to the Applicant is attributable to some or all of the following causes:
- (a) the Applicant's record of chronic customer service failures and customer dissatisfaction. These failures were considered and accepted in the termination report and by the TMRO in 2010–11.²⁶ The Applicant acknowledged that its low delivery in full on-time (**DIFOT**) rates lead to loss of market share.²⁷ It is known in the market that the Applicant's low DIFOT, poor customer service and customer dissatisfaction have not improved and that this detracts from the Applicant's market share and profits;
 - (b) the lower quality of the Applicant's imported products, as compared with our client's high-quality, low-iron CFG;
 - (c) the Applicant alienating customers and potential customers through restrictive or unfair trade practices,²⁸ such as:
 - (i) the Applicant's downstream business competing with the customers of its upstream business;
 - (ii) the Applicant's upstream business preferentially filling orders to the downstream business ahead of other customers; and
 - (iii) charging exorbitant prices in Tasmania because there is no competition in that State to moderate the Applicant's price;
 - (d) manufacturing in a market which has a comparative disadvantage in primary glass production;²⁹
 - (e) appreciation in the Australian dollar. Indeed, the Applicant has said that it was the strength of the Australian dollar, rather than dumping, which caused price suppression and increased imports over the period in which measures were in place;³⁰

²⁴ At p 10.

²⁵ At p 11.

²⁶ Termination Report 159B at 8.9.8; Trade Remedies Branch Report 159C at 9.8.3.

²⁷ CSR Ltd full year results YEM 2010 at p 8.

²⁸ s 269TAE(2A)(d) of the Act.

²⁹ s 269TAE(2A)(f) of the Act.

³⁰ CSR Ltd 2013 annual report at pp 38, 55.

- (f) the inefficiency of the Applicant's business and its high fixed costs. In particular, the Applicant sacrifices production capacity and efficiency by manufacturing several products on a single float line;³¹
 - (g) the ebb and flow of the business cycle;³² and
 - (h) the Applicant's expensive business restructure in 2013. The restructure has resulted in:
 - (i) redundancy costs;
 - (ii) reduced primary production capacity; and
 - (iii) refurbishment, depreciation and other capital costs,
 which have increased the Applicant's production costs and made it difficult or impossible to recover them.
- 5.11 Each of the factors outlined in 5.10 is a matter of legitimate competition between importers and Australian industry,³³ or a cause of injury which is unconnected to CFG imports.
- 5.12 Over the last five years, the Applicant has attributed injury to its business to:
- (a) asset writedowns;³⁴
 - (b) the termination of the insulation rebate scheme;³⁵
 - (c) appreciation in the Australian dollar;³⁶
 - (d) past weakening in the Australian construction industry and demand;³⁷
 - (e) a lack of energy efficient buildings in Australia;³⁸
 - (f) redundancy, remediation and restructuring costs;³⁹
 - (g) industry structural changes;⁴⁰
 - (h) competition;⁴¹
 - (i) energy and manufacturing costs;⁴² and

³¹ Termination Report 159B at 8.9.4; Trade Remedies Branch Report 159C at 9.8.5. See s 269TAE(2A)(f).

³² See Ministerial Direction on Material Injury made under the Act dated 27 April 2012.

³³ See s 269TAE(2A)(d).

³⁴ CSR Ltd 2011 annual report at p 3; 2013 annual report at p 38.

³⁵ CSR Ltd 2011 annual report at p 3.

³⁶ CSR Ltd 2011 annual report at pp 4, 45; 2012 annual report at p 10; 2013 annual report at pp 4, 6, 38, 55.

³⁷ Ibid.

³⁸ CSR Ltd 2011 annual report at pp 4, 45.

³⁹ CSR Ltd 2011 annual report at p 45; 2013 annual report at 10; 2014 annual report at pp 7, 10, 38, 54.

⁴⁰ CSR Ltd 2013 annual report at pp 2, 4.

⁴¹ CSR Ltd 2013 annual report at p 4.

- (j) its adverse product mix.⁴³

These reports show that the causes of injury other than dumping anticipated in Dumping Investigation ITR 159 have in fact injured the Applicant's business. There is a noteworthy similarity between the causes of injury other than dumping foreshadowed in 2010–2011⁴⁴ and those subsequently identified as having materialised in the Applicant's annual reports. Moreover, none of the Applicant's annual reports over that period mentioned injury caused by dumping. As a matter of fact, injury to the Applicant's business has been caused and will be caused by the factors listed in 5.10 and 5.12.

- 5.13 The application does not address alternative causes of injury. Its analysis of material injury is confined to general, unsubstantiated statements asserting that expiration of measures will lead to price undercutting and adversely affect the Applicant's revenue. An assessment of injury must be based on positive evidence and involve an objective examination of the volume and impact of imports.⁴⁵ It must be rigorous rather than speculative.⁴⁶ If the ADC seeks to rely on more cogent information than that provided by the Applicant in this respect, we note that this information must be put to our client.
- 5.14 **Fifthly**, there is a positive correlation between GDP growth and glass consumption. The Applicant acknowledges this in an AGGA National Conference presentation (made by its Executive General Manager, Mr Peter Moeller).⁴⁷ According to IMA Asia, experts in management accounting, Thailand's real GDP growth is forecast to increase from 3.4% in 2016 to 5.7% in 2020.⁴⁸ In particular, IMA Asia estimates that construction sector growth will continue at 5% to 7% in the period 2016 to 2020. It follows that our client will have more than adequate demand in its domestic market, such that it is not rational to dump its product in other markets. There is no merit in the Applicant's claim that Thai exporters or other Asian exporters are seeking outlets in Australia and elsewhere to dump CFG.

6. Dumping is negligible

- 6.1 Our client submits that, even if the Commissioner considers that dumping or material injury are likely to occur, the Commissioner cannot be satisfied that such dumping or injury will not be negligible.
- 6.2 The Act prohibits the Commissioner from recommending that anti-dumping measures be continued unless he is satisfied that their expiration would lead, or be likely to lead, to the continuation or recurrence of the dumping "*that the anti-dumping measure is intended to prevent*": s 269ZHF(2). An anti-dumping measure is not "*intended to prevent*" dumping of a kind which the Act would have required the Commissioner not to investigate. If the Applicant were applying for a dumping duty notice under s 269TB of the Act, instead of its continuation under ss 269ZHB–269ZHC, the Commissioner would be bound to terminate the inquiry under ss 269TDA sub-ss (1), (3) or (13) on the basis that the dumping was negligible. Accordingly,

⁴² Ibid.

⁴³ CSR Ltd 2013 annual report at p 38.

⁴⁴ Termination Report 159B at 8.9; Final Report 159C at 9.8.

⁴⁵ *Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade 1994* Art 3.1.

⁴⁶ See the decision of the WTO appellate body in *United States — Sunset Reviews of Anti-Dumping Measures on Oil Country Tubular Goods from Argentina (AB-2004-4)* at [260].

⁴⁷ AGGA Presentation, "*The Australian Glass Market & The Viridian Strategy*", delivered by Peter Moeller, Executive General Manager of CSR Viridian Ltd.

⁴⁸ IMA Asia, "*Asia Forecast Book, Q2 2016: Forecasts to 2020*".

s 269ZHF(2) of the Act prohibits the Commissioner from recommending the continuation of an anti-dumping measure unless the Commissioner is satisfied that the dumping that will allegedly continue or recur would be of a non-negligible volume, be at a non-negligible margin, and cause non-negligible material injury.

6.3 For the same reasons as those set out regarding recurrence of dumping (section 4) and consequent material injury (section 5), any alleged dumping or material injury is likely to be negligible.

7. **Section 269ZHF(1)(a)(ii) of the Act**

7.1 If the Commissioner considers that materially injurious dumping from exporters other than our client will continue or recur, he should recommend pursuant to s 269ZHF(1)(a)(ii) of the Act that the notice cease to apply to our client. Our client is not and will not be responsible for dumping or consequent material injury to the Applicant, even if other exporters may be so responsible.

Yours sincerely

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Our ref 11276/15604/80175855

Encs

ATTACHMENT A

FY	Total
2004-05	44,475,708
2005-06	43,124,980
2006-07	45,894,869
2007-08	56,514,853
2008-09	68,040,639
2009-10	48,023,884
2010-11	42,674,309
2011-12	41,020,648
2012-13	34,275,917
2013-14	39,442,410
2014-15	47,367,259

Value of CFG imports in AUD, Australia (SITC 66441).

Source: <http://www.qgso.qld.gov.au/products/tables/trade-data-commodity-industry/index.php>

ATTACHMENT B

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8752.0 - Building Activity, Australia, Dec 2015  Quality Declaration
 Latest ISSUE Released at 11:30 AM (CANBERRA TIME) 13/04/2016

DECEMBER KEY FIGURES**Value of Work Done, Chain Volume Measures, , Australia**

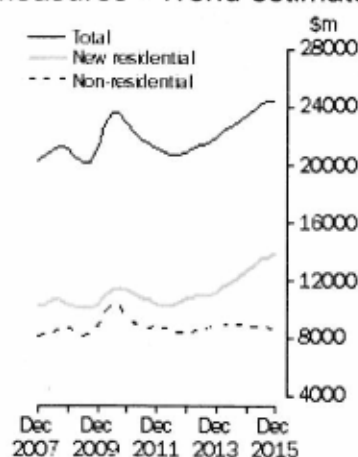
	December Quarter 2015		
	Dec qtr 15 \$m	Sep qtr 15 to Dec qtr 15 %	Dec qtr 14 to Dec qtr 15 %
TREND ESTIMATES(a)			
Value of work done	24 394.6	0.3	4.2
New residential building	13 862.3	1.3	9.3
Alterations and additions to residential building	1 908.3	-1.0	3.2
Non-residential building	8 630.3	-0.9	-2.7
SEASONALLY ADJUSTED ESTIMATES(a)			
Value of work done	24 507.5	1.0	5.7
New residential building	13 960.0	2.1	11.1
Alterations and additions to residential building	1 892.1	-1.8	3.4
Non-residential building	8 655.4	-0.1	-1.5

(a) Reference year for chain volume measures is 2013-14

Value of work done, Chain volume measures



Value of work done, Chain volume measures - Trend estimates



BUILDING WORK DONE

- The trend estimate of the value of total building work done rose 0.3% in the December 2015 quarter.
- The seasonally adjusted estimate of the value of total building work done rose 1.0% to \$24,507.5m in the December quarter, following a rise of 1.0% in the September 2015 quarter.

NEW RESIDENTIAL BUILDING WORK DONE

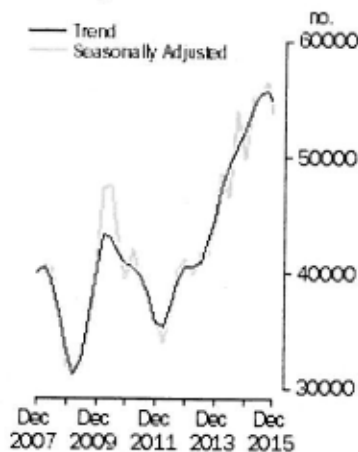
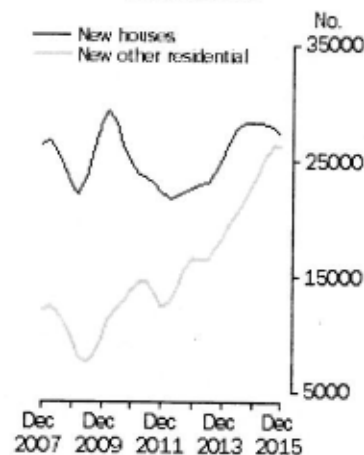
- The trend estimate of the value of new residential building work done rose 1.3% in the December quarter. The value of work done on new houses fell 2.0% while new other residential building rose 5.5%.
- The seasonally adjusted estimate of the value of new residential building work done rose 2.1% to \$13,960.0m. Work done on new houses fell 2.2% to \$7,640.8m, while new other residential building rose 7.8% to \$6,319.3m.

NON-RESIDENTIAL WORK DONE

- The trend estimate of the value of non-residential building work done fell 0.9% in the December quarter.
- The seasonally adjusted estimate of the value of non-residential building work done in the quarter fell 0.1%, following a fall of 1.5% in the September 2015 quarter.

DWELLING UNITS COMMENCED

	Dec qtr 15 no.	Sep qtr 15 to Dec qtr 15 % change	Dec qtr 14 to Dec qtr 15 % change
TREND ESTIMATES			
Total dwelling units commenced	54 829	-1.5	4.6
New private sector houses	27 284	-1.5	-3.4
New private sector other residential building	26 204	-0.7	14.0
SEASONALLY ADJUSTED ESTIMATES			
Total dwelling units commenced	53 727	-5.1	8.0
New private sector houses	26 840	-5.4	-5.8
New private sector other residential building	25 733	-3.8	27.8

Dwelling units commenced**Private dwellings commenced, Trend estimates****TOTAL DWELLINGS**

- The trend estimate for the total number of dwelling units commenced fell 1.5% in the December 2015 quarter following a rise of 0.7% in the September quarter.
- The seasonally adjusted estimate for the total number of dwelling units commenced fell 5.1% to 53,727 dwellings in the December quarter following a rise of 2.3% in the September quarter.

NEW PRIVATE SECTOR HOUSES

- The trend estimate for new private sector house commencements fell 1.5% in the December quarter following a fall of 1.3% in the September quarter.
- The seasonally adjusted estimate for new private sector house commencements fell 5.4% to 26,840 dwellings in the December quarter following a rise of 2.8% in the September quarter.

NEW PRIVATE SECTOR OTHER RESIDENTIAL BUILDING

- The trend estimate for new private sector other residential building commencements fell 0.7% in the December quarter following a rise of 3.2% in the September quarter.
- The seasonally adjusted estimate for new private sector other residential building fell 3.8% to 25,733 dwellings in the December quarter following a rise of 3.9% in the September quarter.

NOTES

FORTHCOMING ISSUES

ISSUE (QUARTER)

March 2016
June 2016

Release Date

13 July 2016
12 October 2016

ABOUT THIS ISSUE

This publication updates the preliminary estimates released in Construction Work Done, Australia (cat. no. 8755.0) on 24 February 2016. The data in this publication are based on a response rate of approximately 90% of the value of building work done during the quarter. The data are subject to revision when returns from the following quarter are processed. Final data for the December quarter 2015 will be released in the next release of this publication, Building Activity, Australia (cat. no. 8752.0) on 13 July 2016.

SIGNIFICANT REVISIONS THIS ISSUE

Compared to the estimate published in Building Activity, Australia, September quarter 2015 (cat. no. 8752.0) released on 20 January 2015:

- the total value of work done in Australia during the September quarter 2015 has been revised upwards by \$242.9m or 0.9%.
- the total value of work commenced in Australia during the September quarter 2015 has been revised upwards by \$1,541.3m or 6.2%. This was driven by upwards revisions to non-residential commencements (\$671.8m) and residential commencements (\$869.5m).
- the number of dwelling unit commencements in the September quarter 2015 has been revised upwards by 1,765 dwellings or 3.1%.

DATA NOTE

Several time series spreadsheets contain 'np' (not available for publication) annotations from the September quarter 2012 onwards. This is due to confidential data being contained in these series.

For the March Building Activity release each year, the ABS publishes revisions that have been made to Building Activity data prior to the December quarter. For the forthcoming March 2016 release, revisions will be provided for the time period from June 2011 to September 2015 and will include revisions resulting from the Building Approvals Annual Review. A feature article has been included in the December 2015 Building Activity, Australia (cat no. 8752.0) publication explaining potential sources of revisions in more detail.

INQUIRIES

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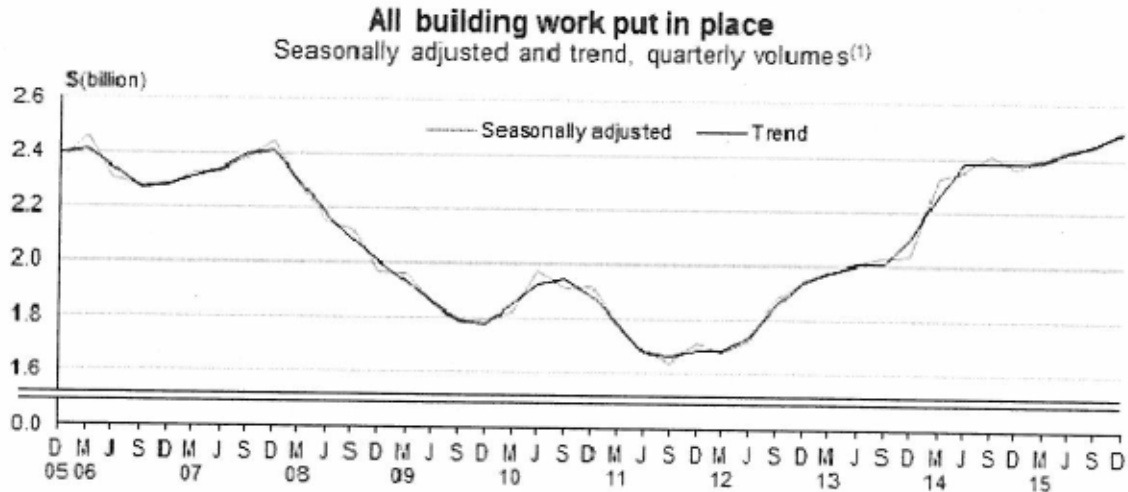
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ATTACHMENT C



1. Volumes are calculated as values at September 1999 quarter prices.
 Source: Statistics New Zealand

All building work put in place, New Zealand — Value of work done. **Source:** Statistics New Zealand.

ATTACHMENT D (CONFIDENTIAL)

Prices

