



**Australian Government**  
**Australian Customs and**  
**Border Protection Service**

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# **INVESTIGATIONS INTO THE ALLEGED DUMPING OF ZINC COATED STEEL AND ALUMINIUM ZINC COATED STEEL**

**EXPORTED FROM**

**THE PEOPLE'S REPUBLIC OF CHINA,  
THE REPUBLIC OF KOREA AND TAWAIN**

**IMPORTER VISIT REPORT**

**GS GLOBAL AUSTRALIA 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 CUSTOMS AND BORDER  
PROTECTION**

**October 2012**

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## **2 BACKGROUND AND PURPOSE**

### **2.1 The application**

On 3 August 2012, applications<sup>1</sup> were lodged on behalf of BlueScope Steel Limited (BlueScope) requesting that the Minister for Home Affairs (the Minister) publish dumping duty notices in respect of:

- zinc coated (galvanised) steel exported to Australia from the People's Republic of China (China), the Republic of Korea (Korea) and Taiwan; and
- aluminium zinc coated steel exported to Australia from China, Korea and Taiwan.

BlueScope alleges that the Australian industry has suffered material injury caused by galvanised steel and aluminium zinc coated steel (the goods) being exported to Australia from China, Korea and Taiwan at dumped prices

On 17 August 2012<sup>2</sup> and 27 August 2012 additional information and data were received in respect of the applications. As a result, the Australian Customs and Border Protection Service (Customs and Border Protection) restarted the 20 day period for considering the applications.

On 5 September 2012, following consideration of the applications, the Chief Executive Officer of Customs and Border Protection decided not to reject the applications and initiated investigations in the alleged dumping of galvanised steel and aluminium zinc coated steel from China, Korea and Taiwan. Public notifications of initiation of the investigations were published in *The Australian* on 5 September 2012. Australian Customs Dumping Notice No. 2012/40 provides further details of the investigations and is available at [www.customs.gov.au](http://www.customs.gov.au).

### **2.2 Anti-dumping investigations and measures for zinc coated steel and aluminium zinc coated steel**

#### **2.2.1 Investigations**

There have been no recent dumping or countervailing investigations in respect of galvanised steel and aluminium zinc coated steel products.

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<sup>1</sup> *Application for Dumping Duties for Galvanised Steel exported from China, Korea and Taiwan* (Galvanised Steel Application) received on 3 August 2012; and *Application for Dumping Duties for Aluminium Zinc Coated Steel exported from China, Korea and Taiwan* (Aluminium Zinc Coated Steel Application) received on 3 August 2012.

<sup>2</sup> Additional information relating to minor issues was also provided on 20 and 21 August 2012.

### 2.2.2 Anti-dumping measures for zinc coated steel and aluminium zinc coated steel

There are no current anti-dumping or countervailing measures on galvanised steel and aluminium zinc coated steel exported to Australia from China, Korea and Taiwan.

### 2.3 Background to meeting

Following the initiation of the investigations, a search of Customs and Border Protection's import database indicated that GS Global Australia Pty Ltd (GS Global) imported goods under investigation from China and Korea during 01 July 2011 to 30 June 2012 (the investigation period). Customs and Border Protection also confirmed from Customs and Border Protection's database that GS Global was [REDACTED] importer of aluminium zinc coated steel and was [REDACTED] importer galvanised steel. GS Global was also nominated as a supplier of the goods.

Customs and Border Protection notified GS Global of the initiation of the investigations and sought their cooperation with the investigations and provided an importer questionnaire in respect of aluminium zinc coated steel to the company to complete<sup>3</sup>. GS Global was also provided with a list of its imports of aluminium zinc coated steel during the investigation period, extracted from Customs and Border Protection's import database, with selected consignments for further verification to source documentation.

GS Global completed the importer questionnaire, providing details regarding the company, overseas supplier information, imports and importation and selling expenses. A copy of Part A (company and supplier details) of GS Global's importer questionnaire response is at **Confidential Attachment GEN 1**.

### 2.4 Purpose of meeting

The purpose of this visit was to:

- confirm that GS Global was a [REDACTED] importer of aluminium zinc coated steel and was a [REDACTED] importer of galvanised steel and obtain information to assist in establishing the identities of the exporters of the goods;
- verify information on imports of aluminium zinc coated steel to assist in the determination of export prices from China and Korea;
- establish whether the export purchases were arms-length transactions;
- establish post exportation costs incurred in importing the goods;

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- identify GS Global's sales and customers and determine sales volume, selling prices and costs;
- recommend how export price may be determined under section 269TAB of the *Customs Act 1901*<sup>4</sup> (the Act); and
- provide GS Global with an opportunity to discuss any issues relevant to the investigations.

Prior to the meeting Customs and Border Protection forwarded an agenda to GS Global and advised that we would require supporting documentation for the selected consignments that had been previously identified. A copy of the visit agenda is at **Confidential Attachment GEN 2**.

### 2.5 Visit

Details of the visit were as follows:

<b>Company:</b>	GS Global
Address:	100 Miller Street, North Sydney NSW 2060 Australia
Telephone no:	(02) 9954 0911
Fax no:	(02) 9954 0919
Visit date:	Friday 5 October 2012
<b>Present at the visit</b>	
GS Global	Mr Kenny Cho, Managing Director Mr Peter Han, Deputy General Manager Mr Sung Brendon Chung, Sales & Marketing & Procurement Manager
Customs and Border Protection	Ms Christie Sawczuk, Manager, Operations 2 Mr Sanjay Sharma, Manager, Operations 2

At the meeting Customs and Border Protection provided a summary of the investigation process and timeframes as follows (highlighting that the following process and timeframes are for both the galvanised steel and aluminium zinc coated steel investigations):

- the investigation period for both investigations is 1 July 2011 to 30 June 2012;
- Customs and Border Protection will examine the Australian market from July 2007 for the purpose of analysing the condition of the Australian industry;
- initial submissions from interested parties are due by 15 October 2012 (in response to the applications and initiation notice);

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<sup>4</sup> Herein all references to legislation in this report refer to the *Customs Act 1901*, unless otherwise specified.

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- a preliminary affirmative determinations (PADs) may be made no earlier than 5 November 2012 (after day 60 from the date of initiations);
- provisional measures may be imposed at the time of the PADs or at any time after the PADs have been made, but Customs and Border Protection would not make such a determination until it was satisfied that there appears to be, or that it appears there will be, sufficient grounds for the publication of dumping duty notices;
- a statement of essential facts (SEF) for respective investigations will be placed on the public record by 24 December 2012 or such later date as the Minister allows;
- this SEF will set out the material findings of fact on which Customs and Border Protection intends to base its recommendations to the Minister and will invite interested parties to respond, within 20 days, to the issues raised (submissions received in response to the SEF will be considered when compiling the report and recommendations to the Minister);
- Customs and Border Protection's report to the Minister is due by 7 February 2013, unless an extension to the SEF is approved by the Minister;
- the Minister will have 30 days from the date of receipt of the final report to make a final decision; and
- certain interested parties have the right to seek a review to the Trade Measures Review Officer in relation to the Minister's final decision.

GS Global have recently been visited by Customs and Border Protection for the concurrent investigation into the alleged dumping of hot rolled coil (HRC) exported from Japan, Korea, Malaysia and Taiwan (Investigation No. 188 refers). Therefore GS Global was familiar with the anti-dumping investigation process.

GS Global was co-operative and had the required documentation available for the visit. GS Global confirmed that it has access to Customs and Border Protection's electronic Public Record and is able to access relevant information for the investigations.

### 2.6 Visit report

Customs and Border Protection advised GS Global that:

- a '*For Official Use Only*<sup>5</sup>' report on the visit will be prepared;
- GS Global would be given an opportunity to review the visit report for accuracy; and

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<sup>5</sup> Which replaces the previously used security classification of '*Confidential*'.

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- a public record version of this visit report would then be prepared in consultation with GS Global and placed on the Public Record for the investigation.

At the outset of the meeting, Customs and Border Protection advised GS Global that the applications in respect of galvanised steel and aluminium zinc coated steel are treated as two separate applications. Therefore two separate investigations are being conducted. Investigation No. 190A refers to galvanised steel and Investigation No. 190B refers to aluminium zinc coated steel.

Customs and Border Protection advised that this approach and treatment of the applications may vary during the course of the investigation process as further analysis is conducted of the goods and the markets in which they operate.

Customs and Border Protection advised GS Global that as a [REDACTED] importer of aluminium zinc coated steel the visit would focus on this product (although certain information regarding galvanised steel would be sought). Sections 3.2 to 10 of this report relate to aluminium zinc coated steel only unless otherwise specified.

### 3 THE GOODS

#### 3.1 The goods the subject of the applications

##### 3.1.1 Description

###### (i) Galvanised steel

The imported goods the subject of the Galvanised Steel Application are:

*“flat rolled products of iron and non-alloy steel of a width less than 600mm and, equal to or greater than 600mm, plated or coated with zinc”<sup>6</sup>.*

The goods the subject of this application (the goods) are generically called galvanised steel (referring to zinc coated steel). The application covers galvanised steel of any width. The application stated that trade and other names often used to describe galvanised steel, include:

- “GALVABOND®” steel;
- “ZINCFORM®” steel;
- “GALVASPAN®” steel;
- “ZINCHITEN®” steel;
- “ZINCANNEAL” steel;
- “ZINCSEAL” steel;
- Galv;
- GI;
- Hot Dip Zinc coated steel;
- Hot Dip Zinc/iron alloy coated steel; and
- Galvanneal.

The application noted that the amount of zinc coating on the steel is described as its coating mass and is nominated in grams per meter squared (g/m<sup>2</sup>) with the prefix being Z (*Zinc*) or ZF (*Zinc converted to a Zinc/Iron alloy coating*). The applicant claims that the common coating masses used for zinc coating are: Z350, Z275, Z200, Z100, and for zinc/iron alloy coating are: ZF100, ZF80 and ZF30 or equivalents based on international standards and naming conventions.

###### (ii) Aluminium zinc coated steel

The imported goods the subject of the Aluminium Zinc Coated Steel Application are:

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<sup>6</sup> Galvanised Steel Application, page 10.



*“flat rolled products of iron and non-alloy steel of a width equal to or greater than 600mm, plated or coated with aluminium-zinc alloys, **not painted** whether or not including resin coating”<sup>7</sup>.*

The goods the subject of this application are generically called aluminium zinc coated steel. The application stated that trade and other names often used to describe aluminium zinc coated steel, include:

- ZINCALUME® steel;
- GALVALUME® steel;
- Aluzinc, Supalume, Superlume, ZAM, GALFAN;
- Zinc aluminium coated steel;
- Aluminium zinc coated steel;
- Alu-Zinc Steel sheet in Coils;
- Al/Zn; and
- Hot Dipped 55% Aluminium-Zinc Alloy coated steel sheet in coil.

The application noted that the amount of aluminium zinc coating on the steel is described as its coating mass and is nominated in g/m<sup>2</sup> with the prefix being AZ (*Aluminium Zinc*). The applicant claims that the common coating masses used are: AZ200, AZ150, AZ100, and AZ70.

### 3.1.2 Product standards

The applications stated that:

*“Typically each Australian and International Standard has a range of steel grades nominated as Commercial, Formable or Structural grades. The commercial/formable grades are those with mechanical properties suitable for general pressing and forming whereas the structural grades are those with guaranteed minimum properties that structural engineers utilize in the design of their final product designs”<sup>8</sup>.*

#### (i) Australia

The applications state that the Australian and New Zealand Standard Industrial Classification Code applicable to galvanised steel and aluminium zinc coated steel is category 2711.

#### (ii) International

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<sup>7</sup> Aluminium Zinc Coated Steel Application, page 10.

<sup>8</sup> Galvanised Steel Application, page 12.

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The applications state that there are a number of relevant International Standards for galvanised steel and aluminium zinc coated steel products (figure 1 refers) that cover a range of products through specific grade designations, including the recommended or guaranteed properties of each of these product grades.

International Standards	Product Grades
<i>General and Commercial Grades</i>	
AS/NZS 1397	G1, G2
ASTM A792	CS, type A, B and C
EN10346	DX51D, DX52D
JIS 3321	SGLCC
<i>Forming, Pressing &amp; Drawing Grades</i>	
AS/NZS 1397	G3
ASTM A792	FS, DS
EN10346	DX53D, DX54D
JIS 3321	SGLCD, SGLCDD
<i>Structural Grades</i>	
AS/NZS 1397	G250, G300, G350, G450, G500, G550
ASTM A792	33 (230), 37 (255), 40 (275), 50 (340), 55 (380), 80 (550)
EN10346	S220GD, S250GD, S280GD, S320GD, S350GD, S550GD
JIS 3321	SGLC400, SGLC440, SGLC490, SGLC570

Figure 1: International Standards for galvanised steel and aluminium zinc steel<sup>9</sup>

### 3.1.3 Tariff classifications

#### (i) Galvanised steel

The application states that galvanised steel is classified to tariff subheadings 7210.49.00 (and statistical codes 55, 56, 57 and 58) and 7212.30.00 (and statistical code 61) of Schedule 3 to the *Customs Tariff Act 1995* (Tariff Act). Based on the information provided in the application, Customs and Border Protection's Trade Policy Branch confirmed that galvanised steel is correctly classified to these tariff subheadings.

The general rate of duty is currently 5% for goods imported under these tariff subheadings. Imports from China are subject to the DCS duty rate which is free. Imports from Korea and Taiwan are subject to the DCT duty rate which is 5%.

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<sup>9</sup> Galvanised Steel Application, page 11 and Aluminium Zinc Coated Steel Application, page 11.

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There are several Tariff Concession Orders (TCOs) applicable to the relevant tariff classification subheading 7210.49.00, which covers galvanised steel (figure 2 refers).

TC No.	Description
TC 0939596	STEEL, COIL, hot dip zinc coated, complying with Japanese Industrial Standard JIS G 3302:2007, having ALL of the following: (a) yield strength NOT less than 275 N/mm <sup>2</sup> and NOT greater than 380 N/mm <sup>2</sup> ; (b) tensile strength NOT less than 440 N/mm <sup>2</sup> ; (c) elongation NOT less than 29% and NOT greater than 41%; (d) coating mass NOT less than 45 g/m <sup>2</sup> and NOT greater than 65 g/m <sup>2</sup> ; (e) thickness NOT less than 1.14 mm and NOT greater than 1.26 mm; (f) width NOT less than 1590 mm and NOT greater than 1605 mm
TC 9612218	STEEL, flat rolled non alloy, hot dipped galvanized, having ANY of the following: (a) differential coating mass on each side; (b) additional iron base alloy electroplated outer coatings; (c) width exceeding 1525 mm; (d) a minimum ultimate tensile strength of 340 MPa

**Figure 2: TCOs applicable to tariff subheading 7210.49.00**

Customs and Border Protection notes that the applications did not specify that TCOs in respect of the goods were applicable. Customs and Border Protection considers the relevance of the TCOs to the goods the subject of the application for galvanised steel requires further investigation.

### (ii) Aluminium zinc coated steel

The application states that aluminium zinc coated steel is classified to tariff subheading 7210.61.00 (and statistical codes 60, 61, and 62) of Schedule 3 to the Tariff Act. Based on the information provided in the application, Customs and Border Protection's Trade Policy Branch confirmed that the goods are correctly classified to this tariff subheading.

The general rate of duty is currently 5% for goods imported under this tariff subheading. Imports from China are subject to the DCS duty rate which is free. Imports from Korea and Taiwan are subject to the DCT duty rate which is 5%.

There are no TCOs applicable to the relevant tariff classification subheading for aluminium zinc coated steel.

### 3.2 'Like' goods

#### 3.2.1 General – both products

GS Global advised that galvanised steel and aluminium zinc coated steel products manufactured domestically by BlueScope are like goods to the galvanised steel and aluminium zinc coated steel imported from China, Korea and Taiwan in terms of commercial likeness, end use and functionality.

GS Global considers that BlueScope has the production capability to manufacture products comparable to the range of galvanised steel and aluminium zinc coated steel products imported into the Australian market from the nominated countries subject to the investigations.

#### 3.2.2 GS Global – aluminium zinc coated steel

##### (i) Standards and grades

GS Global stated that during the investigation period it imported structural grades of aluminium zinc coated steel coil (including [REDACTED]) manufactured to Australian standard [REDACTED]. Customs and Border Protection identified that the GS Global's commercial documentation in respect of the selected consignments of imported goods (Section 5.3 refers), highlighted that the imported goods were manufactured to [REDACTED], which GS Global advised is equivalent to [REDACTED].

GS Global advised that it predominantly imported aluminium zinc coated steel with a coating mass of AZ150, which it stated was the most prevalent product supplied to the Australia market.

##### (ii) Products types and dimensions

GS Global explained that during the investigation period it imported the following two types of aluminium zinc coated steel coil products:

- *type* 1:  
[REDACTED]; and
- *type* 2:  
[REDACTED].

GS Global imported both product types of aluminium zinc coated steel at varying widths and thickness as requested by the Australian customer. For the selected

consignments for verification the product dimensions of the goods ranged from [REDACTED].

GS Global stated that the key difference between the product types relates to product end use. GS Global advised that type 1 aluminium zinc coated steel products are utilised for building and construction end uses (i.e. internal and external frames, such as door frames). GS Global advised that [REDACTED] [use of different types of products]

GS Global advised that it is able to source both types of aluminium zinc coated steel manufactured to any dimension from its suppliers in Korea and China. GS Global advised that the packaging of the imported goods consisted of a protective metal coating and strap as export standard packaging.

### **3.2.3 Like good considerations**

#### (i) Quality

GS Global stated that the quality of the imported product and the domestically produced product is comparable. It advised that Australian importers of the goods (and their customers) imported aluminium zinc coated steel from mills based on established trading arrangements and customer satisfaction of product performance and quality.

#### (ii) Commercial - product differentiation

GS Global advised that there is a no commercial (product) differentiation for aluminium zinc coated steel produced domestically and imported. GS Global advised aluminium zinc coated steel is supplied into the building and construction market segments in Australia, which includes the residential, commercial and commercial parts sub-segments. GS Global advised that aluminium zinc coated steel was not supplied to the automotive market segment.

#### (iii) Exclusion – pre-painted and painted aluminium zinc coated steel

During the investigation GS Global imported pre-painted aluminium zinc coated steel from Korea. GS Global stated that pre-painted or painted aluminium zinc coated steel were not like goods to the goods subject to the investigation, as described in the application. GS Global advised that painted aluminium zinc coated steel is imported into Australia under tariff classification subheadings (and statistical codes) which are not subject to the investigation.

(iv) Substitutability of galvanised steel and aluminium zinc coated steel

GS Global's views were sought regarding the substitutability of aluminium zinc coated steel and galvanised steel. GS Global advised that historically in the Australian market galvanised steel was utilised for building and construction applications. However to address product corrosion of the galvanised steel BlueScope developed and introduced aluminium zinc coated steel products in to the Australian market. GS Global noted that for certain applications both steel products can be utilised, however for specific uses (i.e. applications that require steel with high corrosion resistance, such as building frames with surface areas located near soil), galvanised steel would not be used.

## 4 COMPANY BACKGROUND

### 4.1 Company background

#### 4.1.1 General background

GS Global is a propriety limited company limited by shares and was established in 1990. Prior to this period GS Global traded as SsangYong (Australia) Pty Ltd.

GS Global advised that it is a 100% owned subsidiary of GS Global Corporation, Korea (GS Global Korea). GS Global Korea is a major trading house that operates in the energy, retail and construction sectors. From March 2005 after a successful partnership with LG, GS Global's parent entity changed its name to GS Global and announced the official start as a group of companies specialising in energy, chemical, steel products, machineries distribution and construction. GS Global Korea is publically listed on the Korean Stock Exchange and is a 100% owned subsidiary of GS Holdings, which is a holding company for the GS group of companies.

GS Global provided its company brochure that includes an overview of the GS Global group of companies, their history, organisational structure and commercial functions (**Confidential Attachment COM 1** refers).

GS Global has participated in a number of Customs and Border Protection anti-dumping investigations in respect of steel commodities including the ongoing HRC investigation.

#### 4.1.2 Functions of company

GS Global identifies itself as a trader (importer and distributor) of a range of carbon steel products including HRC, steel plate, galvanised steel and aluminium zinc coated steel. GS Global advised that it

[REDACTED]  
[GS Global's business model].

During the investigation period, GS Global made offers to customer's, distributors, wholesalers and end users, negotiated with overseas suppliers, arranged importation of the goods, and delivered and sold imported goods to its Australian customers under agreed credit terms.

GS Global stated that it has [REDACTED] employees at its North Sydney office. GS Global estimates that in 2011 aluminium zinc coated steel and galvanised steel sales

represented approximately █% and █% of total sales respectively. GS Global observed that the sales of both coated steel products have decreased and this trend has continued in 2012.

#### 4.2 Accounting

GS Global explained that it uses █ accounting software and its financial year is from January to December. GS Global advised that its financial statements and reports are externally audited by Price Waterhouse Coopers. GS Global provided its Statement of Earnings for the calendar year ending 2011 and the six months ending June 2012 (unaudited) to cover the investigation period (**Confidential Attachment COM 2** refers).

#### 4.3 Relationship with suppliers

GS Global advised it is the exclusive sales agent of █ for the supply of carbon steel products, including aluminium zinc coated steel and galvanised steel in the Australian market. During the investigation period GS Global sourced aluminium zinc coated steel from

█

█. [GS Global suppliers]

GS Global advised that it has no commercial relationship other than buyer and seller with █ and that all export sales transactions were arms length. Section 5.2 of this report details the export sales negotiation process, which GS Global advised that the price of the goods was determined on a transaction by transaction basis following the sales negotiation process with customers and the manufacturers, █. GS Global advised that it did not receive any rebates or commissions from █ in respect of aluminium zinc coated steel sales. █ GS Global claimed that GS Global Korea is not related to █. GS Global claimed that █ did not receive any rebates or commissions in respect of aluminium zinc coated steel sales.

#### 4.4 Relationships with customers

GS Global stated that it supplies aluminium zinc coated steel to wholesalers, distributors and end users.

During the investigation period GS Global supplied aluminium zinc coated steel to █ Australian customers that were predominantly distributors. GS Global



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identified its major aluminium zinc coated steel customers, representing approximately █% of total sales, as listed below:

\_\_\_\_\_

GS Global stated that it is not related to any of its domestic customers. It noted the relationship between GS Global and its customers reflected normal commercial arrangements (of buyer and seller) and were arms length transactions. GS Global advised that it does not maintain any long term contracts with its customers or offer any rebates or discounts in respect of aluminium zinc coated steel.

## 5 IMPORTS

### 5.1 Introduction

Customs and Border Protection's import database indicates that during the investigation period GS Global imported approximately [REDACTED] tonnes of aluminium zinc coated steel<sup>10</sup> and [REDACTED] tonnes of galvanised steel. The following table summarises the total volume of aluminium zinc coated steel imported by GS Global from respective Korean and Chinese suppliers.

Exporter / supplier	Aluminium zinc coated steel (tonnes)
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

GS Global noted that all aluminium zinc coated steel is sourced through [REDACTED] even though the [REDACTED] manufacturer of the goods is listed as the supplier in Customs and Border Protection's import database.

As part of GS Global's importer questionnaires response, it identified discrepancies with the list of aluminium zinc coated steel importations extracted from Customs and Border Protection's import data base (**Confidential Attachment IMP 1** refers). GS Global identified a significant discrepancy for the quantity recorded for one consignment. GS Global advised that for this consignment the quantity was incorrectly recorded as 59,317.64 tonnes instead of 62.46 tonnes, resulting in a significantly low unit price for the goods. Customs and Border Protection advised that given the magnitude of the discrepancy an amending Full Import Declaration should be lodged (supported by the commercial documentation of the goods).

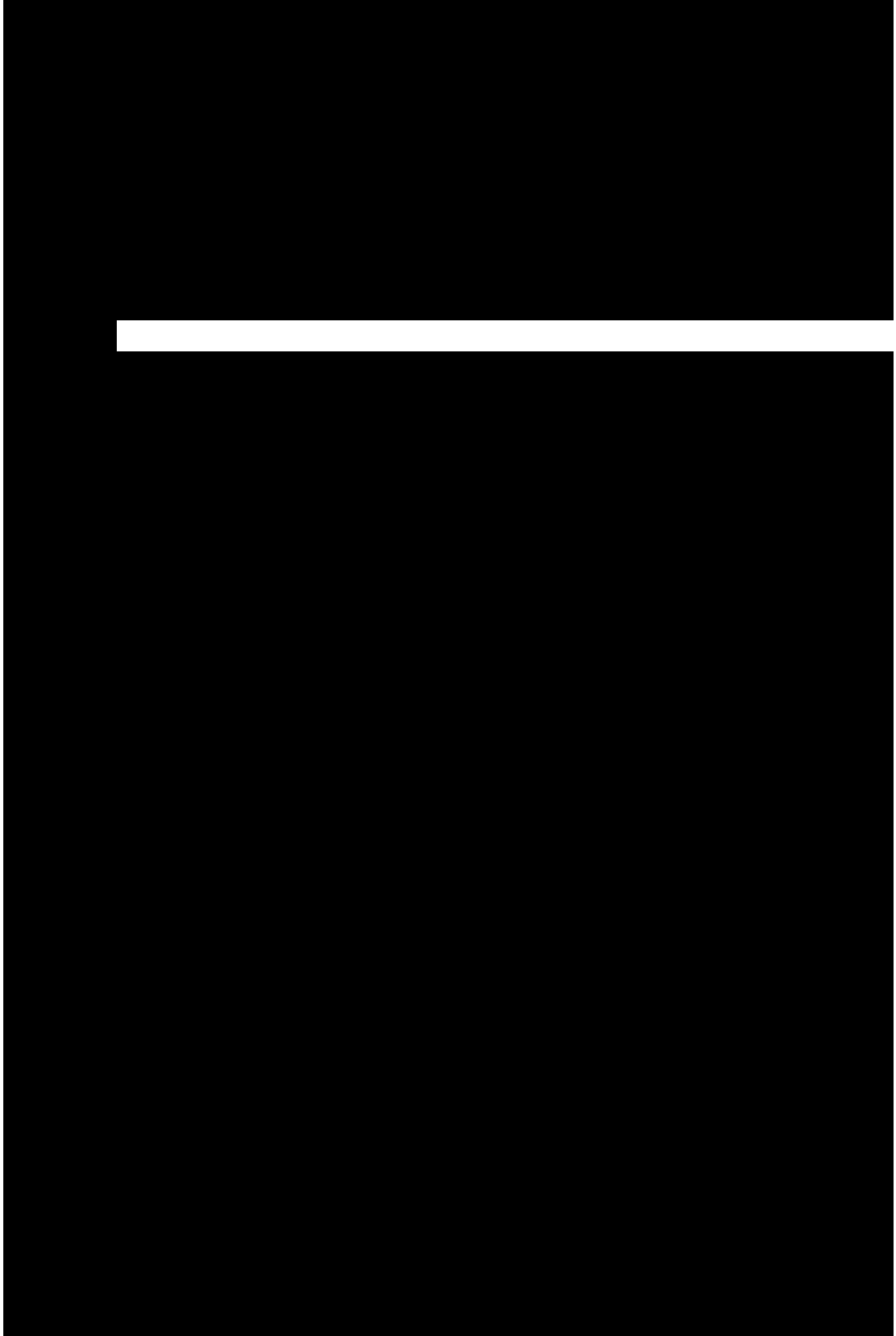
### 5.2 Ordering process and price

GS Global outlined its process for ordering aluminium zinc coated steel sourced from Korea and China.

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<sup>10</sup> Import volumes are as confirmed by GS Global.

5.3



[REDACTED] [GS

Global's detailed ordering process].

### 5.3 Verification

Prior to the visit Customs and Border Protection selected eleven shipments, representing approximately [REDACTED]% of the total number of importations during the investigation period. This is to allow GS Global to prepare and provide the necessary source documents in the form of shipment information and invoicing to allow Customs and Border Protection to verify and reconcile the documents to the completed importer transaction (questionnaire) form. The completed importer questionnaire form is at **Confidential Attachment IMP 2**.

GS Global provided source documentation to verify the data in its importer transaction form for the selected shipments in the investigation period.

The source documentation provided to verify the data in GS Global importer transaction form included the following:

- commercial tax invoice by [REDACTED];
- packing list;
- weight list;
- evidence of payment to [REDACTED];
- Bill of Lading;
- evidence of ocean freight and land transport insurance covers;
- invoices for importation costs;
- evidence of Bank charges to [REDACTED];
- transportation invoices;
- evidence of transportation costs; and
- evidence of payment of importation costs for selected importations.

The source documentation form **Confidential Attachment IMP 3**.

#### 5.3.1 Supplier invoice details

Customs and Border Protection confirmed that GS Global purchased aluminium zinc coated steel from [REDACTED], as evidenced by the commercial invoices for the goods. GS Global provided a monthly summary of purchase orders from customers and product lists for the selected shipments identifying the manufacturer of the goods. This documentation confirmed that the aluminium zinc coated steel imported by GS Global was manufactured by:

Using the commercial documentation we verified the invoice prices (including delivery and credit terms), volume and supplier details for each of the selected shipments on the importer transaction form. GS Global also provided evidence of payment for the selected consignments. We also observed the provided bank statement extracts displayed the payment to [REDACTED]. GS Global explained that [REDACTED] is the Australian branch of the [REDACTED], and that [REDACTED] forward the payment to [REDACTED].

### 5.3.2 Shipment costs

As the delivery terms of the imported goods are [REDACTED], GS Global entered an amount in its importer transaction form for overseas freight that reflected the amount stipulated for freight on its commercial invoice from [REDACTED]. GS Global advised that as its business model operates according to reliable and expedient delivery of the goods it incurred higher overseas freight expenses. Using the source documentation for the selected consignments we verified the overseas freight amounts to the importer transaction form (with one minor discrepancy which was due to error and which was resolved).

GS Global explained that it also takes out an insurance policy with [REDACTED] to cover marine and local transportation insurance for imported goods (to address the risk of damaged goods through transportation etc.). GS Global provided copies of its insurance policies for the investigation period at a rate of [REDACTED]. Extracts of these insurance policies are at **Confidential Attachment IMP 4**. The amount included for insurance on GS Global importer transaction form, was calculated by multiplying the insurance premium by sales revenue for each of the selected shipment. We verified that the amount of insurance had been correctly recorded in the importer transaction form.

The following table summarises the weighted average shipment costs incurred for the selected consignments of aluminium zinc coated steel.

Item	Weighted average cost AUD / tonne (Korea)	Weighted average cost AUD / tonne (China)
Ocean freight	[REDACTED]	[REDACTED]
Marine and local transportation insurance	[REDACTED]	[REDACTED]

### 5.3.3 Importation costs

Under the heading of '*Australian Importation Costs*' in the importer transaction form, GS Global entered amounts for customs entry fees, customs broker fees, port

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service charges (charged on a gross weight basis), delivery, bank charges and credit insurance. GS Global identified in its importer transaction form demurrage at the wharf costs for some shipments, and explained that this cost is included on the delivery invoice.

Customs and Border Protection considers that the credit insurance related to domestic sales of the goods and re-located them under this cost category in the importer transaction form (Section 5.4.2 refers).

GS Global provided supporting Customs brokers invoices, invoices from transportation companies and evidence of payment for the post exportation costs incurred. We were able to verify the total amounts on the invoices to evidence of payment (as payment is made on a monthly basis the total amount paid included a number of shipments, GS Global was able to provide supporting documentation which enabled verification of the costs for the shipment and the total amount paid).

GS Global advised that it incurs bank charges related to the payment of the goods to [REDACTED]. GS Global advised that the [REDACTED] either charges [REDACTED]. GS Global provided documentary evidence provided from its bank to verify the bank charges for two of the selected shipment (Confidential Attachment IMP 3 refers).

Customs and Border Protection compared the relevant importation cost source documentation to the importer transaction form, and identified a few minor discrepancies due to error. We revised the importation transaction route form and are satisfied that importation costs have been accurately recorded (**Confidential Attachment IMP 5** refers).

The following table summarises the weighted average importation costs incurred for the selected consignments of aluminium zinc coated steel.

Item	Weighted average cost AUD / tonne (Korea)	Weighted average cost AUD / tonne (China)
Port service charges	[REDACTED]	[REDACTED]
Brokers fee	[REDACTED]	[REDACTED]
Customs and Border protection entry fee and import duty (5% for imports from Korea)	[REDACTED]	[REDACTED]
Bank charges	[REDACTED]	[REDACTED]
Delivery charges (cartage)	[REDACTED]	[REDACTED]

#### 5.4 Selling, general and administrative (SG&A) expenses and selling costs

##### 5.4.1 SG&A

In its importer transaction form GS Global included SG&A expenses which it derived by dividing total expenditure by total revenue for the financial year 2011. To verify the SG&A expenses, GS Global provided a breakdown of SG&A expenses obtained from its statement of earnings for 2011 and for the six month period ending June 2012 (which showed expenses by month) (**Confidential Attachment IMP 6** refers). We noted that a '*bank charge*' expense item was included in the SG&A expense breakdown. We sought GS Global's clarification whether these charges had been duplicated in the import transaction form. GS Global advised that the bank charges had not been duplicated and that these bank charges related to general accounting fees.

Customs and Border Protection was able to verify the total sales revenue and expenses to the Statements of Earning provided by GS Global. Customs and Border Protection noted that expressed as a percentage of sales revenue, SG&A expenses represented [REDACTED] for the six months ending June 2012. For the importer transaction form GS Global calculated SG&A expenses for the selected shipments as [REDACTED]. Customs and Border Protection calculated an SG&A figure of [REDACTED] (to cover the entire investigation period). As there is not a significant variation in the SG&A figures for the respective periods and to ensure the entire investigation period is covered and to ensure SG&A figures are derived from audited financial statements, Customs and Border Protection considers this approach (and revised calculation) is reasonable.

##### 5.4.2 Credit expenses

GS Global included in its importer transaction form a credit insurance cost based on its credit insurance premium rate of [REDACTED]% of sales revenue for each shipment. GS Global provided its credit insurance policy evidencing its insurance premium rate (**Confidential Attachment IMP 7** refers). We verified that the credit cost had been accurately recorded in the importer transaction form.

##### 5.4.3 Summary of selling expenses

The following table summarises the weighted average SG&A expenses and credit expenses incurred for the selected consignments of aluminium zinc coated steel (sold on the Australian market).

Item	Weighted average cost AUD / tonne (Korea)	Weighted average cost AUD / tonne (China)
SG&A	██████████	██████████
Credit insurance	██████████	██████████

## 5.5 Export prices for shipments

Based on verification of the eleven shipments, Customs and Border Protection calculated weighted average FOB export prices (in AUD) for the goods covering the investigation period, by deducting overseas freight from the CNF ██████████ prices (**Confidential Attachment IMP 8 refers**). Customs and Border Protection noted that GS Global did not deduct the marine and local insurance costs in deriving FOB export prices in the importer transaction form. Customs and Border Protection considers that this approach is reasonable, as these expenses are an importation cost and are not identified as part of the overseas freight cost on the commercial invoice (██████████). The insurance component for marine activities cannot be separated from the local freight insurance component and it represents a minor proportion of the total cost of the goods.

The following table summarises Customs and Border Protection's calculated weighted average FOB export prices for the selected shipments of aluminium zinc coated steel

Aluminium zinc coated steel	FOB export price AUD / tonne
Korea	██████████
China	██████████

## 5.6 Forward orders

GS Global provided a detailed list of forward orders (until December 2012) for aluminium zinc coated steel in its responses to Importer questionnaire response (**Confidential Attachment IMP 9 refers**). GS Global has forward order of aluminium zinc coated steel imported from China and Korea of ██████████ tonnes and ██████████ tonnes respectively. GS Global advised that it expects to continue to source supply of aluminium, zinc coated steel from China and Korea at volumes comparable to the previous year.

## 5.7 Who is the importer

We noted that GS Global:

- is named as the customer on supplier invoices;
- is named as the consignee on the Bills of Lading; and



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- arranges delivery of the goods to its customers.

We consider GS Global was the beneficial owner of the goods at the time of importation and is therefore the importer.

### 5.8 Who is the exporter?

Customs and Border Protection will generally identify the exporter as:

- a principal in the transaction located in the country of export from where the goods were shipped who gave up responsibility by knowingly placing the goods in the hands of a carrier, courier, forwarding company, or their own vehicle for delivery to Australia; or
- a principal will be a person in the country of export who owns, or who has previously owned, the goods but need not be the owner at the time the goods were shipped.

Where there is no principal in the country of export Customs and Border Protection will normally consider the exporter to be the person who gave up responsibility for the goods as described above.

We reviewed the documentation provided in relation to the sample shipments ordered through [REDACTED]. Upon review of this documentation and other information supplied by GS Global, we are satisfied that:

- the commercial invoices identify the supplier as [REDACTED];
- the bills of lading identify the relevant Manufacturer as the shipper of the goods; and
- the manufacturers arrange and pay for the goods to be transported to the wharf and loaded onto the ship in the country of export;
- [REDACTED] pays the relevant manufacturer and
- GS Global pays [REDACTED]

Based on the information available we consider that [REDACTED] may be a trading house and is therefore unlikely to be the exporter. Customs and Border Protection understands that [REDACTED] purchases the goods from [REDACTED] the manufacturers of the goods who may be the exporters.

Customs and Border Protection considers that the question of who is the exporter should be resolved following further investigation with [REDACTED].

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## **6 AUSTRALIAN MARKET AND SALES**

### **6.1 General**

GS Global advised that the Australian aluminium zinc coated steel market is supplied by BlueScope and imports from the nominated countries and Japan. GS Global stated that the import volume of aluminium zinc coated steel from the nominated countries represented approximately 10% of the total market volume. As mentioned previously, GS Global advised that aluminium zinc coated steel is supplied to the building and construction market segment. It advised that for this market segment the aluminium zinc coated steel product structural [REDACTED] with product dimensions of [REDACTED] represents approximately [REDACTED] of the total market volume.

GS Global advised that over the last two years the size of the Australian aluminium zinc coated steel market has decreased as a direct consequence of the following factors:

- the slowdown in the global economic climate and in global steel markets;
- decreased international and domestic demand and domestic oversupply; and
- reduced Government spending on infrastructure (i.e. the school building revolution) and cessation of policies and programs designed to stimulate growth in the building and construction industries (which has contributed to the decreased demand).

GS Global estimated that the market size for aluminium zinc coated steel in the next six to twelve months will continue to decline, especially due to the expected continuation of the global economic downturn and increased pressure by Australian suppliers to maintain sales in a depressed market.

GS Global stated that the Australian aluminium zinc coated steel market was very competitive, with price the main determinant of demand and supply. GS Global advised that BlueScope is the dominant supplier in the market and price setter. GS Global advised that price was influenced predominantly by costs of raw materials.

Global advised that the Australian customers for aluminium zinc coated steel are importers, traders / distributors, wholesalers, end user and manufacturers.

### **6.2 Australian sales**

As an importer and distributor, GS Global supply a range of steel products, including aluminium zinc coated steel to customers at varying levels of trade.

In its importer questionnaire response, GS Global provided domestic sales of the imported goods for the selected consignments. GS Global also provided a sales report extracted from its accounting system and management reports for all sales of aluminium zinc steel during the investigation period (**Confidential Attachment SALES 1** refers). This report identified the country of origin of the imported goods and the supplier (which showed [REDACTED] was the supplier for all products sold in the domestic market by GS Global).

In the investigation period GS Global supplied aluminium zinc coated steel to:

[REDACTED]

During the investigation period GS Global supplied aluminium zinc coated steel to [REDACTED] domestic customers as tabulated below:

Domestic customer	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

For total sales, the three largest customers (measured by volume), [REDACTED] GS Global's domestic sales report shows sales were made [REDACTED] to [REDACTED] customers [REDACTED] in [REDACTED].

GS Global advised that while customers were based in specific regions that the goods may have been delivered to different regions (as designated by the customer).

GS Global advised that its customers predominately source supply of aluminium zinc coated steel from BlueScope. GS Global claims that it offered a second and alternative source of supply for its customers and was able to supply products which

BlueScope had declined to supply to the domestic customer<sup>11</sup>. GS Global provided no evidence to substantiate their claim.

6.3 Price and distribution arrangements

As discussed at Section 5.2, on a [REDACTED] basis price offers are distributed by GS Global to its domestic customers<sup>12</sup>. GS Global advised that the sales negotiation process does not vary based on the customer (or by the customer's level of trade).

[REDACTED]

Credit terms	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

[REDACTED]

<sup>11</sup> GS Global advised that this was based on commercial decisions by BlueScope not to supply certain products and not based on production capability or manufacturing restrictions.  
<sup>12</sup> This section should be read in conjunction with Section 5.2.

[calculation of profits and terms of trade]

GS Global advised that once the goods have been delivered that the domestic customers pay GS Global for the goods according to the specified credit terms. It advised that it does not provide for early payment discounts for the goods.

## 6.4 Rebates and discounts

GS Global advised that it provides no rebates or discounts to domestic customers in respect of sales of aluminium zinc coated steel. Through the verification processes discussed at Sections 6.6 and 6.7 we identified no evidence to indicate that rebates or discounts were applicable.

## 6.5 Commission

GS Global advised that it provides no commissions to domestic customers in respect of sales of aluminium zinc coated steel. During the verification process we noted that GS Global's statement of earnings contained a [REDACTED]. GS Global explained that this [REDACTED] item related to commission payments for another investment entity and was not related to the goods under investigation.

## 6.6 Sales verification (accuracy)

As discussed at section 6.2, GS Global provided a domestic sales report of aluminium zinc coated steel for the investigation period, shown by product type, customer name and level of trade, volume and FIS price (Confidential Attachment SALES 1 refers). For each of the selected imported consignments GS Global provided the corresponding domestic sales invoice and evidence of payment by the domestic customer to GS Global for the goods.

We verified the source documentation to the recorded sales values and volume for the domestic sales related to the selected shipments. We verified that the amount paid by the domestic customer matched the amounts shown on the commercial invoice. Sales invoices and evidence of payment are Confidential Attachment IMP 3.

We also reconciled the volume and values recorded in GS Global's sales spreadsheet list. We are satisfied that the sales report accurately reflects GS Global's domestic sales of the goods.

## 6.7 Upwards verification (completeness)

As discussed at Section 4.2, GS Global provided its statement of earnings for the calendar year ending 2011 and the six months ending June 2012 to cover the

investigation period (**Confidential Attachment COM 2** refers). We were able to identify total income / revenue, cost of goods manufactured, total expenses and operating profit for all sales (and we sighted these for aluminium zinc coated steel) for GS Global.

We sought to verify the completeness and relevance of the sales data of aluminium zinc coated steel provided by GS Global. As GS Global's financial year is aligned to the calendar year, we were not able to verify the sales listing of aluminium zinc coated steel to audited financial reports. We sighted management report which showed total sales in 2011 and the six months ending June 2012, which identified aluminium zinc coated steel sales (revenue and costs) extracted by product code 'AZ'. We were able to match the figures to the statement of earnings.

To further test the completeness of the sales data we sought to reconcile GS Global's sales data and the data provided in Customs and Border Protection's import data base (without pre-painted and painted products). Customs and Border Protection noted a minor variance between the total volumes when compared with the sales data provided by GS Global for the investigation period. Customs and Border Protection considers this variance is not material and results from the timing difference between the datasets (as the sales data is based on invoice date and the importation data is based on valuation date). Customs and Border Protection is satisfied that the dataset provided is complete and accurate.

## 6.8 Profitability of sales and selling price

In order to calculate the sales revenue for each consignment, we used the selling prices for aluminium zinc coated steel, as shown in GS Global's domestic sales listing (which we verified to source documentation). We calculated the profits for each consignment.

[REDACTED]  
Overall, the weighted average profitability for the selected consignments was [REDACTED].

For the selected consignments which were

[REDACTED] to ensure delivery of the goods. Customs and Border Protection noted that this [REDACTED].

[REDACTED]. As the imported consignments were [REDACTED] overall, at this stage, pending further verification at the suppliers / manufacturers premises we do not consider there is any indication that GS Global will directly or indirectly be reimbursed, be compensated, or otherwise receive a benefit for, or in respect of, the

whole or part of the price<sup>13</sup> nor does it warrant a variation from the conclusion on arms length in Section 7.1.

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<sup>13</sup> s. 269TAA(2)

## **7 ARMS LENGTH**

### **7.1 General**

In determining export prices under s. 69TAB(1)(c) and normal values under s. 269TAC(1), the legislation requires that the relevant sales are arms length transactions.

Section 269TAA outlines the circumstances in which the price paid or payable shall not be treated as arms length. These are where:

- there is any consideration payable in respect of the goods other than price;
- the price is influenced by a commercial or other relationship between the buyer, or an associate of the buyer, and the seller, or an associate of the seller;
- in the opinion of the Minister, the buyer, or an associate of the buyer, will, directly or indirectly, be reimbursed, be compensated or otherwise receive a benefit for, or in respect of, the whole or any part of the price.

Furthermore, where:

- goods are exported to Australia otherwise than by the importer and are purchased by the importer from the exporter (whether before or after exportation) for a particular price; and
- the Minister is satisfied that the importer, whether directly or through an associate or associates, sells those goods in Australia (whether in the condition in which they were imported or otherwise) at a loss;

the Minister may treat the sale of those goods at a loss as indicating that the importer or an associate of the importer will, directly or indirectly, be reimbursed, be compensated or otherwise receive a benefit for, or in respect of, the whole or a part of the price.

For sales between [REDACTED] and GS Global we noted that overall the sales of the imported aluminium zinc coated steel in the Australian market were [REDACTED]. We also noted that the purchase price of aluminium zinc coated steel between GS Global and [REDACTED] is determined based on the [REDACTED] of the goods.

We did not find any evidence that:

- there is any consideration payable other than price; or that
- the price is influenced in GS Global's favour by a commercial or other relationship between GS Global and [REDACTED].



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- GS Global was directly or indirectly reimbursed, compensated or otherwise received a benefit for or in respect of the whole or any part of the price.

We confirmed during our verification that the price invoiced by [REDACTED] was the price paid by GS Global. GS Global stated that transactions between GS Global and [REDACTED] were arms length transactions. Therefore, at this stage we consider sales between [REDACTED] and GS Global were arms length transactions, subject to further investigation and verification of data provided by [REDACTED] and the manufacturers of the goods.

## **8 DUMPING, MATERIAL INJURY AND CAUSATION**

### **8.1 General**

GS Global stated that it does not consider that the Australian industry has suffered injury as a result of dumped imports of aluminium zinc coated steel from China, Korea and Taiwan. GS Global advised that the Chinese and Korean manufacturers of aluminium zinc coated steel from which [REDACTED] sources supply strongly assert that exports of the goods to Australia were not dumped.

GS Global attributes any injury experienced by the Australian industry to the following factors:

- *Economic conditions impacting the global market* – GS Global advised that the global steel markets (including for steel related products) are depressed (following from the global financial crisis). It advised that this depression has resulted in downwards pressure on global steel prices and reduced competitiveness of global markets. GS Global advised that the conditions of the global steel market directly impact the prices for steel products in the Australian markets. It noted that in the next six to twelve months, the European economic crisis, reduced international business confidence and reduced global demand (especially from China) for Australian steel exports will impact on the Australian steel markets.
- *Economic conditions impacting the domestic market* – GS Global advised that the Australian market for aluminium zinc coated steel is depressed as a result of decreased demand, reduced consumption and over supply. It noted that the cessation of the Federal Government housing and new home owner stimulus policies and programs has directly impacted on the building and construction market segment for aluminium zinc coated steel.
- *Appreciation of the Australian dollar* – GS Global stated that the appreciation of the Australian dollar has impacted on the Australian market for aluminium zinc coated steel, resulting in increasing the competitiveness of imports (i.e. as they are cheaper). It stated that the price of the aluminium zinc coated steel produced by BlueScope and imported from suppliers in the nominated countries were comparable; however the currency increased the competitiveness of imports.
- *Imports from countries not nominated in the application* – GS Global noted that imports from countries other than those nominated in the application (i.e. Japan) may be impacting the Australian market for aluminium zinc coated steel. It noted that the prices for imports from these countries, given current

market conditions (depressed prices and over supply) would be competitive and comparable to the prices of imports from the nominated countries.

- *Market share held by the Australian industry* – GS Global stated that BlueScope's sales of aluminium zinc coated steel represent the significant majority of the Australian market. It noted that the import of the goods from the nominated countries represents a relatively minor proportion of the total volume of the Australian market (approximately 10%). It stated that the import volumes do not dominate the market and therefore pricing behaviour of these imports would not be causing injury to the Australian industry. GS Global also noted that the majority of customers which source the imported material also source material from BlueScope. It noted that BlueScope's dominance in the market is evident, that even with increased competitiveness of imports local customers still predominantly source product from BlueScope.
- *Inefficiencies and ineffectiveness of the Australian industry* – GS Global noted that BlueScope's ability to effectively compete with imports of aluminium zinc coated steel is impacted by its inefficient production facilities (including out dated machinery and technology) compared to overseas producers. GS Global stated further inefficiencies resulted from BlueScope's higher organisation costs, higher labour costs and higher transportation costs. It noted that any injury experienced by the Australian industry is a result of its inability to adopt innovative measures to improve the efficiency and competitiveness of its business. GS Global stated that the cessation of BlueScope's export business would be contributing to excess domestic supply of its products.

## **8.2 Other comments**

In addition to the comments summarised at Section 8.1, GS Global noted that:

- the Australian market for aluminium zinc coated steel needed to retain a source of imported products as an alternative to domestic supply, especially to accommodate periods where domestic supply is not available; and
- there are advantages to being able to source supply domestically.

## **9 UNSUPPRESSED SELLING PRICE**

Unsuppressed selling price (USP) and non-injurious price (NIP) issues are examined at an early stage of an investigation and, where possible and appropriate, preliminary examinations are made during the application consideration period for the purpose of assessing injury and causal link and therefore the appearance of reasonable grounds for the publication of a dumping duty notice.

Customs and Border Protection generally derives the NIP by first establishing a price at which the applicant might reasonably sell its product in a market unaffected by dumping. This price is referred to as the USP.

Customs and Border Protection's preferred approach to establishing USPs observes the following hierarchy:

- industry selling prices at a time unaffected by dumping;
- constructed industry prices – industry cost to make and sell plus profit; or
- selling prices of un-dumped imports.

Having calculated the USP, Customs and Border Protection then calculates a non-injurious price by deducting the costs incurred in getting the goods from the export free on board point (or another point if appropriate) to the relevant level of trade in Australia. The deductions normally include overseas freight, insurance, into-store costs and amounts for importer expenses and profit.

At the time of the visit GS Global did not have any comments on the calculation of an USP or NIP.

## **10 RECOMMENDATIONS**

As a result of the importer questionnaire submitted by GS Global and the verification conducted on site, we are of the opinion that the goods imported by GS Global are:

- goods that have been exported to Australia otherwise than by the importer;
- appears that the goods have not been purchased by the importer from the exporter;
- appears that purchases of the goods by the importer and its supplier and exporter were arms length transactions; and
- the goods are subsequently sold by the importer to a person who is not an associate of the importer.

Subject to further inquiries with the exporter and supplier of the goods, at this stage we are satisfied that the export prices should be established under s. 269TAB (1) (c) of the Act having regard to further details about the export arrangements over the course of the investigation.

<b>11 ATTACHMENTS</b>
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Confidential Attachment No.	Title
Confidential Attachment GEN 1	Part A of GS Global importer questionnaire response (confidential version)
Confidential Attachment GEN 2	Verification visit agenda
Confidential Attachment COM 1	GS Global Group - company brochure
Confidential Attachment COM 2	GS Global's Statement of Earnings for 2011 and the period ending 2012
Confidential Attachment IMP 1	List of GS Global's importations extracted from Customs and Border Protection's import database
Confidential Attachment IMP 2	Complete Importer transaction form provided by GS Global for Part B of their importer questionnaire response
Confidential Attachment IMP 3	Source documentation for the selected shipments (relating to both importation and domestic sales)
Confidential Attachment IMP 4	Extract of marine and freight insurances policies
Confidential Attachment IMP 5	Revised importer transaction form
Confidential Attachment IMP 6	GS Global's SG&A expense breakdown (covering the investigation period)
Confidential Attachment IMP 7	Extract of credit insurance policy
Confidential Attachment IMP 8	FOB export price calculations
Confidential Attachment IMP 9	GS Global's forward orders of aluminium zinc coated steel
Confidential Attachment SALES 1	GS Global's domestic sales report for aluminium zinc coated steel for the investigation period