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Director Operations 1
Anti-Dumping Commission
Level 35, 55 Collins Street VIC 3000
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Non-Confidential

Attention Mr George Katsoulis

Dear Mr Katsoulis

COMMENTS ON THE SEF AND GUARDIAN'S SUBMISSION (EPR 031)

1. In the SEF comments on a price premium included:

   The original investigation found that Viridian was able to obtain a price premium in the market; Viridian advised the Commission that it considers that price competition from imports is eroding that premium. The Commission has been unable to quantify a premium in the current inquiry, and therefore has made no finding at this time with regard to this claim. *(page 11)*

   The Commission finds that there is clearly close price competition between the Australian industry and the imported goods; it appears likely that some part of the difference in price is the (unquantified) local price premium which Viridian may be able to command for local supply, but the degree of price undercutting would be increased if the existing anti-dumping measures had not been applied. (page 43)

2. As previously submitted there is not a local price premium on the price of 3-12mm CFG as the price competition from imports simply does not allow for any price differentiation

[redacted] In the assessment of price effects in section 6.3.2 it is recalled that in 2015 [redacted]

Confidential injury analysis.

		[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]	[redacted]	[redacted]	[redacted]	[redacted]

4. Viridian does not have any information on CFG importer expenses and profit which would assist the Commission in establishing an unsuppressed selling price. In the absence of that information it appears that the Commission is considering establishing a non-injurious price by using Viridian's weighted average cost to make and sell of the goods (exclusive of profit).

5. The dumping margins for the two Indonesian exporters are significantly different (AMG is 14.4% and Muliaglass is 0. 3%).Has the Commission examined the reasons for such a discrepancy? This is important given the comments that Muliaglass has "sufficient spare capacity to increase export volumes immediately if it wished to do so".[1]

6. In concluding that an ad valorem rate is the preferred duty mechanism it is noted that in Brazil duties were imposed on a dollar per tonne basis. This fixed amount was also followed by India when it imposed duties in 2014.[2]

7. In EPR 031 the exporter notes:

   ... The SEF acknowledges at 5.3.1 and 8.4.2.1 that Viridian is able to command a local price premium for local supply.

[1] Section 8.3.4
[2] Viridian's email 20 May 2016.

It is pointed out that this refers to Investigation 159C and not the current continuation enquiry.

8. In EPR 031 the exporter makes further observations about Viridian's imports of the like goods. It has been pointed out to the Commission these observations are incorrect and details of Viridian's imports have been provided.

Yours sincerely

J J Croft