

PUBLIC RECORD  
DATE RECEIVED 22 JULY 2016

Dear Mr Katsoulis

Non Confidential (**attachment is confidential**)

**Submission EPR 036**

This submission contains details of imports sourced from DIPB. Our ABS data does not reconcile with some of the figures in the submission and no attempt has been made to reconcile all of the data with the ABS data. In this context the comments in section 5.2 of the SEF are relevant.

It is worth noting:

In paragraph 2 of the Guardian submission reference is made to the data excluding 2mm imports. As far as we are aware this is not possible as the import code 700529009 includes CFG not exceeding 3mm. This means that 2mm thicknesses would be included along with 3mm. Consequently, Guardian's analysis in paragraph 2 excludes both 2 mm and 3 mm thicknesses.

In Guardian's submission (EPR 029) the import volume chart in Viridian's submission (EPR 028) was described as being incorrect. But that chart was based on the thicknesses covered by code 09. Guardian seemed to be indicating in that submission that imports in code 09 (when it commenced) from Thailand were mainly 2mm thickness.

In Guardian's submission the relevant code 02 in 2011 is missing. (02 was discontinued and replaced by 09 at the end of 2011). It is not clear what the code 07 is in the data supplied to Guardian. If our understanding is correct then code 09 from Thailand for the 2012-2015 period principally includes 2mm thickness but this has not been shown in the submission. The figures in the data supplied by Guardian to the ADC for CFG not exceeding 3mm (and including 2mm) are not too dissimilar (with the exception of 2011) to the figures used in the Viridian submission (EPR 028).

Guardian's conclusions on volume market share are not correct. In the confidential attachment to this email is the market volume as recorded by Viridian in the format of Figure 2 in the SEF. As was noted in the SEF "Viridian's sales volume is comprised of both external sales and internal transfers." The volume market share is therefore not an indicator of something that does not exist (a premium for CFG).

The confidential attachment also shows a different estimate of the Australian market. As noted in yesterday's conversation, this Australian market figure is confidential as making Viridian's calculations public would be disclosing commercially sensitive information which, were it not for this inquiry, would not be available to the ADC or any other party.

The confidential attachment also shows a different value to the percentage in the last sentence on page 21 of the SEF.

Viridian is able to clarify any other matters should this be required.

Regards

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