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Director Operations 1
Anti-Dumping Commission
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Non Confidential

Attention Mr George Katsoulis

Dear Mr Katsoulis

COMMENTS ON VARIOUS SUBMISSIONS

To clarify Australian Independent Glass's statement in the second paragraph of its submission (EPR 042), AIG does not manufacture the like goods. It does, however, process float glass into products such as glass for windows and buildings.

Viridian doesn't accept AIG's description of its business. AIG's submission refers to three factors which are addressed below.

- (a) AIG does not consider that it can purchase from a supplier who is also AIG's competitor in the downstream market.

Viridian Comment

Viridian does supply some products to AIG.

- (b) By purchasing from upstream Viridian, AIG risks giving downstream Viridian information about AIG that would unfairly advantage downstream Viridian in competing with AIG.

Viridian Comment

The protection of confidential information is of paramount importance to Viridian. The organisational structure is designed to give a separation between the business units producing and selling the clear float glass from those that are selling processed glass.

- (c) Downstream Viridian abuses its market position by refusing to supply AIG. Generally, Viridian refuses to supply AIG by using petty excuses. It is nonetheless clear that Viridian's true motive is to force its small competitors to purchase CFG at prices that are inflated by anti-dumping measures.

Viridian Comment

Viridian understands that AIG's comment relates to the supply of processed glass and that the last order placed by AIG against Viridian's Adelaide glass processing plant was in 2013.

In relation to AIG's comment about a price premium, Viridian is of the view that there is no price premium for 3-12mm CFG commodity glass.

AIG's observation that Viridian "...Imports large quantities of glass from Xinyi..." is not correct. Xinyi's submission (EPR 041, on the EPR 2 August) confirms this. (AIG's submission is dated 28 July 2016.)

An Excel file was provided to the Commission on 7 July which showed that Viridian's imports of glass products did not include the like goods being 3-12mm clear float glass.

The Xinyi submission refers to Guardian's observation (EPR 015) that there is an "alliance or arrangement" between Xinyi and Viridian. Xinyi's submission dismisses the Guardian assertion.

Further evidence that there is not an "alliance or arrangement" with Xinyi is found in the confidential table attached to this submission. That table shows products supplied to Viridian and it can be seen that the volumes and value would not lead to the relationship with the supplier as being an "alliance or arrangement".

Guardian's submission (EPR 043, paragraph 1.4) picks up a comment made in the Xinyi submission that:

"... Xinyi is not in possession of enough information to comment on AMG's suggestion that Viridian may have purchased the goods as exported by Xinyi from other parties."

Viridian does not import 3-12mm clear float glass from Xinyi and does not purchase 3-12mm CFG manufactured by Xinyi from a third party.

The Commission will be aware that the Guardian submission at paragraph 2.1 uses the wrong volume measure (tonnes instead of m²)

The comments in this submission by Viridian also answer the observations made in the exporter's submission at EPR 044.

If the Commission requires further evidence that will further support Viridian's representations, then please advise.

Yours sincerely



J. Croft