



地址：中国北京建国门外大街1号
国贸写字楼1座3层
Add: Third Floor China World Office 1
No.1 Jian Guo Men Wai Avenue, Beijing ,China

电话/Tel: +8610 65057866 / 67 / 68
传真/Fax: +8610 65057869
网址/Website: www.greatwalllawfirm.com
邮编/P.C.: 100004

8 September 2014

By Email: operations2@adcommission.gov.au

**The Director
Operations 2
Anti-Dumping Commission
Customs House
5 Constitution Avenue
CANBERRA ACT 2601**

**Anti-Dumping Investigation No. 238 of Certain Deep Drawn Stainless Steel Sinks
Exported from China
Komodo Submission on Products Exemption and Weighted Average Dumping
Margin**

This submission is filed on behalf of Komodo Hong Kong Limited, Guangzhou Komodo Kitchen Technology Co., Ltd and their manufacturer Zhongshan Xintian Hardware Co., Ltd. (herein after referred as “Komodo”) to express opinion on exemption of certain products from antidumping/countervailing measures and make comments on Weighted Average Dumping Margin in relation to the Anti-Dumping Commission’s investigation into the alleged dumping and subsidization of deep drawn stainless steel sinks exported to Australia from the People’s Republic of China (China).

I. Summary

Komodo hold the same position with three importers in this case that the Commission shall recommend to the minister to exempt the small corner radius sinks from antidumping/countervailing measures according to s.8 (7) and s.10 (8) of the Customs Tariff Act 1975 and related facts. If the above products can not be exempted from antidumping/countervailing measures, Komodo propose the Commission at least calculating separate dumping margins for small corner radius sinks other than that of large corner radius sinks.

Concerning the preliminary finding of dumping investigation of this case, Komodo thinks that it is very unfair to use the average dumping margin of Primy and Zhuhai Grand as Komodo's dumping margin since Komodo’s export prices are much higher

than that of Primy, Grand and Jiabaolu. Komodo never dumped subject products to Australia and never caused harm to the Australian Producer. According to the comprehensive export condition of Komodo, Komodo request the commission to grant individual treatment to Komodo in the final determination.

If the Commission can not accept Komodo's request for individual treatment, then Komodo apply for price undertaking for the products exported by Komodo to Australia instead of implementing antidumping and countervailing duties.

II. Exemption of Small Corner Radius Sinks from Antidumping/Countervailing Measure

Komodo noticed that three importers Abey Australia Pty Ltd, Seima Pty Ltd and International Research and Marketing Corporation have filed submissions requesting the authority to exclude small radius sinks from the range of subject products or exempt small radius sinks from antidumping/countervailing measures. It shows that the issue on small radius sinks has drawn wide attention. As the same time, the Commission has also issued a letter to petitioner seeking further views on 21 August 2014. Komodo hold the same position with the above three importers and thinks that small radius sinks shall be exempted from antidumping/countervailing measures.

1. Small radius sinks are eligible for exemption under the Customs Tariff Act

(1) Related legislation and Policy

For the exemption of antidumping/countervailing measure, it is stipulated in s.8 (7) and s.10 (8) of the Customs Tariff Act 1975 that:

The Minister may, by notice in writing, exempt goods from interim dumping duty, dumping duty and countervailing duty if he is satisfied:

(a) that like or directly competitive goods are not offered for sale in Australia to all purchasers on equal terms under like conditions having regard to the custom and usage of trade;

(b) that a Tariff Concession Order under Part XVA of the Customs Act 1901 in respect of the goods is in force;

(c) that:

(i) where the goods are goods to which section 11 of the Customs Tariff Act 1987 applies—the item in Schedule 4 to that Act that applies to the goods is expressed to apply to goods, or to a class or kind of goods, as prescribed by by-law; and

(ii) suitably equivalent goods the produce or manufacture of Australia are not reasonably available;

(d) that:

(i) the tariff classification in Schedule 3 to that Act that applies to the goods is such that no duty is payable in respect of the goods or the duty payable in respect of

the goods is at a rate equivalent to a rate payable under Schedule 4 on the goods, and
(ii) suitably equivalent goods the produce or manufacture of Australia are not reasonably available; or
(e) that the goods, being articles of merchandise, are for use as samples for the sale of similar goods.

It is stated in the Dumping and Subsidy Manual that: *the exemption power could be exercised when the Minister makes a decision to impose a duty following an investigation; the Commission shall undertake a comparative analysis between the local and the imported goods in question in order to determine whether like, or competitive goods, are offered for sale by the local industry.*

In the letter dated 21 August 2014 the Commission also made the following assertion: *In the case where the Commission is satisfied that goods are eligible for an exemption under the Customs Tariff Act, the Commission will recommend that the Parliamentary Secretary to the Minister for Industry (the Parliamentary Secretary) specifically exempt those goods from anti-dumping measures. This recommendation may be made at the time of delivering the final report to the Parliamentary Secretary in relation to the ongoing investigation, or at a later date.*

According to the above legislation and policy, Komodo made the following analysis to prove that the local industry can not offered for sale like, or competitive goods of small radius sinks; small radius sinks are eligible for exemption under the Customs Tariff Act.

(2) Small radius sinks are different from normal sinks on many aspects

- **Product Characteristics**

As stated by Abey in its submission: *traditionally the bowl of a deep drawn sink features a corner radius of 70 to 100 mm, which gives the bowl a rounded look (when viewed from above). More recently a technique was developed to allow deep drawn sink bowls to be produced with a corner radius of only 15 to 25 mm, which gives the bowl a much squarer look, similar to fabricated sinks.* Benefit from the small corner radius, small radius sinks have more modern style and more elegant appearance than large radius sinks. Another advantage of small radius sinks is the greater volume of bowls than large radius sinks with similar outside dimensions. So small radius sinks are more approximate to fabricated sinks no matter on product characteristics or product tier.

- **Production Process**

The small radius sinks' production process are more complex than large radius sinks. As stated by Abey in its submission: *deep drawn sink bowls are normally made by cold drawing stainless steel sheet in a press. The new squarer deep drawn sink bowls require an additional annealing process and second draw. The process is as follows:*

- first (cold) draw to around 85% to 90% of the final volume of the bowl
- bowl is annealed (heated to 1,300°C and air cooled to soften the steel), and
- second (soft) draw to complete the bowl.

Some producers may also make annealing processing for some large radius sink models, but annealing is not indispensable for the production of large radius sinks. However, the small radius sinks can not be produced without annealing process for their squarer shape.

At the same time, for the production of small radius sinks, moulds with higher precision are needed, there are higher breakage rates during pressing. Small radius sinks are also difficult to polish and require additional labor and specialized machinery.

- **Price/Profit Margin**

In comparison with the large radius sinks that have similar structure/thickness/outside dimension, the prices small radius sinks are relatively higher. For this point, Komodo made a comparison form as follows:

Large Radius Model	Average Price (USD/PC)	Similar Small Radius Model	Average Price (USD/PC)
[]	[]	[]	[]
[]	[]	[]	[]
[]	[]	[]	[]
[]	[]	[]	[]

(The contents in the brackets are model names and prices; they belong to Komodo’s proprietary information.)

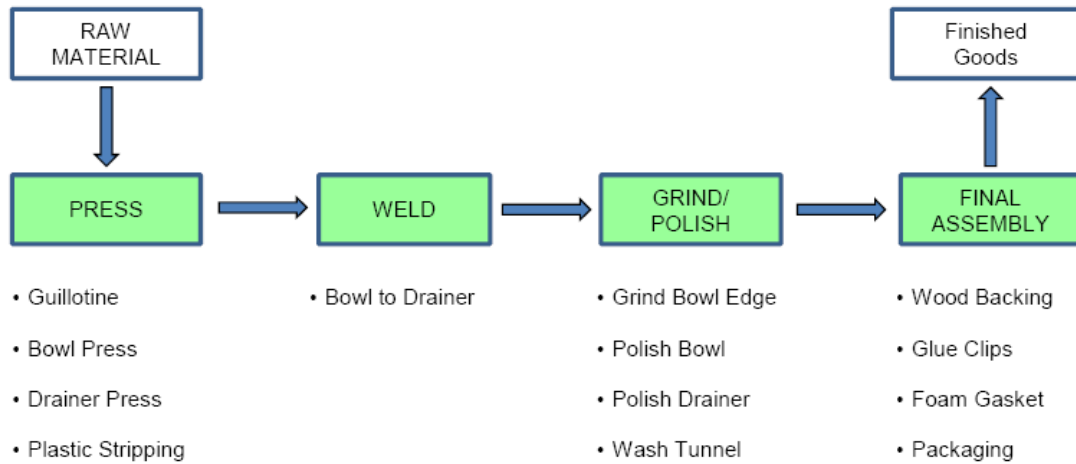
At the same time, as the small radius sinks are newly developed products, only a few number of producers can produce the products, the profit margin of small radius sinks are also relatively higher than that of large radius sinks with similar structure/thickness/outside dimension.

(3) Tasman does not produce small radius sinks, Tasman has no capability to produce small radius sinks, Tasman may not have the capability to produce small radius sinks in foreseeable future

Firstly, Tasman does not produce small radius sinks. As stated in the submission of Seima, Tasman does sell a small radius sink; however this product is part of their international series, is sourced internationally. The above point is confirmed by the “Response to submission of Abey Australia Pty Ltd” filed by Australian Industry on 10 June 2014. It was sated in the response submission that: *the Australian industry accepts that it does not currently produce a model of deep drawn stainless steel sink that is identical in all respects to the so-called tight radius sinks.*

Secondly, Tasman has no capability to produce small radius sinks. As stated above,

there must be the annealing process for the production of small radius sinks. According to the production process and equipment disclosed by Tasman, we can see that Tasman do not have the annealing equipment, and thus do not have the ability to produce small radius sinks. Please see the below production process chart provided by Tasman in its application, there's no annealing.



In the verification report of Tasman, the manufacturing facilities of Tasman were disclosed as follows, there's also no annealing equipment.

Tasman's manufacturing facilities are located at Regency Park in Adelaide. Tasman operates a single production line at this facility, which can be logically broken into two stages:

- 1. pressing and cutting of sink bowls and drainer boards; and*
- 2. welding, edge grinding, polishing and finishing.*

Thirdly, Tasman will not have the capability to produce small radius sinks in foreseeable future. In Komodo's opinion, it would not be feasible for Tasman to manufacture smaller radius sinks in Australia because:

- Investment costs would be prohibitive (press tooling, annealing, and specialized polishing equipment) and would need to be leveraged across a small market; especially for the annealing equipment, its purchasing and operating costs are very high. The annealing equipment need to be operated continuously without stop everyday, which consumes large amount of electricity. It is impossible for the production scale of Tasman to support the operation of annealing equipment;
- Expertise: Tasman does not have the experience or technical skills to implement such a project;
- Health and safety considerations do no permit the annealing process for Tasman in Australia.

Given that small radius sinks are different from normal sinks on many aspects, Tasman does not have the capability to produce small radius sinks, Komodo claims that small radius sinks are eligible for exemption under the Customs Tariff Act.

2. Exempting small radius sinks from antidumping/countervailing measures is in conformity with public interest

As stated above, small radius sinks are newly developed and high-end products. Small radius sinks are different from normal sinks on many aspects. Tasman does not produce small radius sinks in Australia, under this condition, Tasman does not use large radius sinks to compete with small radius sinks but sources small radius sinks internationally. It shows that there is a certain extent of irreplaceability between small radius sinks and large radius sinks. If antidumping and countervailing duties are imposed on small radius sinks, Australian consumers will have to buy small radius sinks with much higher price. Just like Abey has stated in its submission that: *if the duties are imposed on small radius sinks then the Australian consumer is basically being penalized on a product category that the Australian Industry does not and probably can not manufacture.* The duties may also lead to an effect that the consumers are forced to give up small radius sinks and choose low-end and backward products. This is contrary to the trend of the technology development and may harm the public interest.

So, we believe it is in conformity with public interest to exempt small radius sinks from antidumping/countervailing measures. It is also in conformity with the Australian industry's interest as Tasman also needs to import small radius sinks. Komodo sincerely request the Commission recommending to the minister to exempt the tight corner radius sinks from antidumping/countervailing measures in the final report.

III. Calculation Separate Dumping Margin for Tight Corner Radius Sinks

If the Commission does not accept the above views of Komodo and decide not exempt small radius sinks from antidumping/countervailing duties, Komodo propose the Commission at least calculate separate dumping margins for small radius sinks.

As stated above, small radius sinks belong to newly developed and high-end products; their prices and profit margin are higher than normal drawn sinks. So the dumping margins of small radius sinks must be much lower than that of large radius sinks. It is not proper just using the dumping margin of large radius sinks on small radius sinks. We found that there are precedent cases in Australia that calculated separate dumping margin for different specifications of subject products. Such as in the case of float glass, the authority calculated dumping margin separately for each thickness specification (3mm, 4mm -----12mm).

So it is proper to assess separate dumping margins for large radius sinks and small radius sinks respectively in the current case. Especially in the condition that Australian industry can't produce small radius sinks, lower dumping margin for small radius sinks will enable customers to buy small radius sinks at reasonable prices.

IV. Comments on Weighted Average Dumping Margin for Residual Exporters

1. It is very unfair to use the average dumping margin of Primy and Grand as Komodo's dumping margin

According to the Preliminary Affirmative Determination Report No.238, the preliminary dumping margin pertains to the subject products of Komodo (produced by Xintian) is the dumping margin for residual exporters which has *been determined as a comparison between the weighted average of export prices with the corresponding weighted average normal values of Primy and Zhuhai Grand (Jiabaolu was excluded as the preliminary dumping margin for that exporter is negligible) in accordance with s.269TACB(2)(a). The preliminary dumping margin for residual exporters is 35.0 percent.*

The above decision is very unfair to Komodo at the following aspects:

- (1) The export prices of Komodo are much higher than that of Grand, Jiabaolu and Primy, Komodo has never exported subject products to Australia at dumping prices.

According to the data got by Komodo, the average per kg^① transaction price between Komodo GZ and Komodo HK of subject products (which were sold by Komodo HK to Australia) is about []USD/Kg (FOB), which is []. In consideration that the export prices of Komodo HK to Australia are about [] higher than that of Komodo GZ to Komodo HK, the actual export prices of Komodo will be more higher than that of other exporters. The above condition can also be approved by the responses to questionnaire filed by the exporters or the import customs data that have already been grasped by the Commission.

(The contents in the brackets are price information of Komodo; they belong to Komodo's proprietary information.)

In consideration of the dumping margin of Grand, Jiabaolu and Primy are 19.4%, negligible and 42.4% respectively; the actual dumping margin of Komodo (whose export prices are much higher) shall be under Zero.

So is very unfair to use the much lower export prices of other exporters to calculate the dumping margin of Komodo. Especially for the condition that Jiabaolu's export prices are lower than that of Komodo, but its dumping margin is negligible and the dumping margin for Komodo is 35%.

- (2) Komodo never tried to expand its export of subject products to Australia by the method of dumping at low price.

^① Please notice that we used the per kg price, which is more proper for comparison than per piece price, as the sizes and weights of all kinds of product models are different.

As showed in the response to questionnaire, Komodo has only one customer in Australia for sink products, i.e. Abey Australia Pty Ltd (Abey). It is also stated the in the submission filed by Abey on 30 April 2014 that: *Abey imports Chinese sinks from Komodo, under an exclusive supply arrangement.* Komodo and Abey have maintained a long-term cooperation since year 2006.

At the same time Komodo focus mainly on designing excellent product models and making good control on the quality of products. Komodo has set up a design team in the Company and sent a quality controlling team to its supplier Xintian.

The above operation mode and idea decided that it is unnecessary and impossible for Komodo to conduct dumping in Australia market.

(3) The subject products exported by Komodo have not caused injury to Australian Industry

Firstly, as stated above, Komodo's export price is higher than most other Chinese exporters' prices. The export prices of Komodo could not have caused price suppression and depression of Australian Industry.

Year	Export Quantity Index of Subject Products of Komodo to Australia (PC)
2010	100.0
2011	77.4
2012	77.3
2013	65.4

(The contents in above form are export quantities of Komodo; they belong to Komodo's proprietary information, so Komodo expressed them by the way of index.)

Secondly, the Australian Industry has not lost market share to the import of Komodo's products. On one hand, as showed by the above form: over the past few years, the annual export quantity of subject products of Komodo to Australia experienced continuous decrease; on the other hand, the sole customer of Komodo in Australia has been importing deep drawn stainless steel sinks for 25 years, if Abey had not imported subject product from Komodo, Abey might also have imported from other countries.

In consideration to the above conditions synthetically, it shows that Komodo is a completely innocent exporter in the current case. Komodo is just doing export business to Australia in lawful and rational way. Komodo never dumped subject products to Australia, never caused any harm to Australian Industry. If the 35% dumping duty is levied on the exports of subject products of Komodo, Komodo may lose most of its export business to Australia. Komodo is being punished for the wrongful deeds of other exporters. It is unjust treatment to Komodo.

So, Komodo sincerely request the Commission to calculate an individual dumping margin for Komodo according to the export prices and production costs reported by Komodo itself.

As stated below, it is appropriate to include Komodo into the selected exporters and calculate an individual dumping margin for Komodo.

2. It is Appropriate to include Komodo into selected exporters and grant individual treatment to Komodo

Firstly, the export value of Komodo to Australia is ranked fourth among all the exporters in China. If Komodo is included in the selected exporters, the total export value of selected exporters during POI will be more representative. In many previous antidumping cases, the Commission granted individual treatment to more than four exporters. We believe that to investigate one more exporter will not significantly increase the workload of the Commission or prevent the timely completion of the current case.

Secondly, Komodo is the main exporter of small radius sinks to Australia. According to the knowledge of Komodo, the three selected exporters Primy, Grand and Jiabaolu did not export many small radius sinks to Australia during POI, their export amount of small radius sinks has no representativeness in the current case. If the Commission decides to include the small radius sinks into subject products and implements antidumping/countervailing duty on small radius sinks, the export prices and normal values of small radius sinks shall also be assessed. To assess the export prices and normal value of small radius sinks, the Commission would better include Komodo in the selected exporter, as Komodo is the main exporter of small radius sinks to Australia.

Thirdly, Komodo Companies together with Zhongshan Xintian Hard Ware Co., Ltd have already submitted high quality response to the exporter questionnaire. The response is complete and the data are reconcilable. The Commission can examine the dumping margin and subsidy margin by using the data in the submitted questionnaire response.

V. Application of Price Undertaking

If the Commission can not agree with the above ideas of Komodo and decides not to grant Komodo individual treatment, then Komodo will apply price undertaking for its export to Australia.

1. It is in conformity with related legislation for Komodo HK, Komodo GZ together with Xintian applying price undertaking now

Concerning price undertaking, it is stipulated in s.269TEB (1) & (2) of the Custom Act that:

(1) A person who:

(a) if application has been made for publication of a dumping duty notice in respect of goods—is an exporter of such goods; or

(b) if application has been made for publication of a countervailing duty notice in respect of goods—is the government of the country of export, or is an exporter, of such goods;

may, at any time after the making of a preliminary affirmative determination in respect of the application, indicate in writing to the CEO the terms in which the government or exporter would be prepared to give an undertaking to the Minister.

(2) The CEO must consider whether he or she is satisfied that those terms are adequate to remove the injury, or the threat of injury, to which the application is addressed so far as the government or exporter offering the undertaking is concerned, and, by notice in writing;

(a) if the CEO is so satisfied—recommend to the Minister that he or she accept the undertaking; or

(b) if the CEO is not so satisfied—indicate to the government or exporter the reasons why he or she is not so satisfied.

In the current case of deep drawn stainless steel sink, Komodo HK with Komodo GZ is the exporter of subject products; Xintian act as OEM to them. The three companies together (herein after generally referred as “Komodo”) is proper to be the applicant of undertaking according to the above stipulations.

In addition, the preliminary affirmative determination of the case has been made on 13 August 2014. It is proper time for Komodo to apply price undertaking.

2. Proposition of terms on price undertaking

According to s.269TG (4) & (5) and s.269TJ (3A) & (3B)^②, the terms on price

^② 269TG

(4) Whether or not a notice has been given to an exporter, the Minister may defer the decision to publish or not to publish a dumping duty notice covering that exporter, for so long as the Minister considers appropriate, if the exporter offers, and the Minister accepts, an undertaking that the exporter will so conduct future trade to Australia in like goods as to avoid:

(a) causing or threatening material injury to an Australian industry producing like goods; or

(b) materially hindering the establishment of such an Australian industry.

(5) In giving a notice, and in considering the terms of any proposed undertaking, the Minister must have regard to the desirability that any price increase to which the undertaking relates is limited to an amount such as the total price of the goods is not more than the non-injurious price of the goods.

269TJ

(3A) This subsection applies:

(a) to an undertaking given by a government—if it is an undertaking that the government will, in relation to any export trade to Australia in like goods, review any countervailable subsidy delivered by that government and make any changes found to be necessary to avoid:

(i) causing or threatening material injury to an Australian industry producing like goods; or

(ii) materially hindering the establishment of such an Australian industry; and

undertaking shall have the effect that avoid causing material injury to Australian industry in the future trade of subject product, and the undertaken price may be not more than the non-injurious price. So Komodo propose the following undertaking terms to the Commission:

(1) Setting a benchmark price, Komodo undertake to export subject products to Australian at prices higher than the benchmark price in future.

As there are many models of stainless steel sink, Komodo thinks it is not necessary to set benchmark for each model. Instead, Komodo propose to set a per Kg price for all the models. It is also convenient for the Customs to make inspection on the implementation of undertaking.

To avoid causing material injury, the decided antidumping duty and countervailing duty shall be counted in the benchmark price.

So proposed method on setting of original benchmark price is as follows:

Original benchmark price=
2013 average export price of subject products of China*(1+antidumping duty rate)
*(1+countervailing duty rate).

According to the customs data from ITC (International Trade Centre), the 2013 average export price of subject products of China is 9.3 USD/Kg (Please refer to appendix: 2013 Customs Data). Then the benchmark price will be:

9.3 USD/Kg *(1+antidumping duty rate) *(1+countervailing duty rate).

If the above benchmark price is taken, there will be the effects that just like antidumping duty and countervailing duty have been imposed. It is enough to avoid causing material injury to Australian industry.

(2) Method for adjusting the benchmark price

The benchmark price may be adjusted periodically to reflect the fluctuation of normal market price. The basis of the adjustment may be the variation rate of prices of non-dumping and non-subsidy imports of Australia. Komodo propose using Australian average import data of like products from third countries. The proper adjusting period may be 6 months (half year).

So the variation rate may be calculated through the following formula:

(b) to an undertaking by an exporter—if it is an undertaking that the exporter will so conduct future trade to Australia in like goods as to avoid:

- (i) causing or threatening material injury to an Australian industry producing like goods; or
- (ii) materially hindering the establishment of such an Australian industry.

(3B) In giving a notice, and in considering the terms of any proposed undertaking, the Minister must have regard to the desirability that any price increase arising from the undertaking is limited to an amount such that the total price of the goods is not more than the non-injurious price of the goods.

$$\text{Variation rate} = \frac{\text{Average import price from third countries of the recent half year}}{\text{Average import price from third countries of the last half year}} - 1$$

The benchmark price may be adjusted through the following formula:

$$\text{New benchmark price} = \text{old benchmark price} * (1 + \text{Variation rate}).$$

For example, if the undertaking starts from Jan 2015, then the first benchmark price shall be calculated as:

$$\text{First benchmark price} = \frac{\text{Average import price from third countries of Jul-Dec 2014}}{\text{Average import price from third countries of 2013}} * \text{original benchmark price}$$

The second benchmark price shall be calculated in July 2015 as:

$$\text{Second benchmark price} = \frac{\text{Average import price from third countries of Jan-Jun 2015}}{\text{Average import price from third countries of Jul-Dec 2014}} * \text{First benchmark price}$$

The later benchmark prices will be calculated in the same way like the second one.

The benchmark price adjustment calculation may be made by Komodo and reported to the authority together with related evidences.

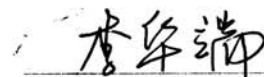
(3) Restriction on customer

Komodo promise only export subject products to the sole consumer Abey during the period that antidumping and countervailing measures are effective. As the export channel is restricted, the export of subject products of Komodo in future will not affect the production of Australian industry.

Komodo believe the above terms of price undertaking will surely take the effect that avoid causing material injury to Australian industry in the future trade of subject product by Komodo. It is enforceable and acceptable.

Yours faithfully,

Great Wall Law Firm



Huaduan Li | Lawyer

Appendix: 2013 Customs Data

List of importing markets for a product exported by China

Product: 73241000 Sinks & wash basins, stainless steel

Bilateral 8 digits	Importers	2011	2012	2013	Exported value in 2013, US Dollar thousand	Exported quantity in 2013, Kilograms
		Exported unit value, US Dollar/Kilograms	Exported unit value, US Dollar/Kilograms	Exported unit value, US Dollar/Kilograms		
	World	4.64	5.50	6.50	584,872	89,941,610
+	United States of America	6.26	6.34	6.57	109,972	16,728,285
+	Malaysia	3.25	4.41	6.35	41,964	6,603,422
+	Russian Federation	4.92	7.55	9.00	37,989	4,219,597
+	Australia	8.18	9.13	9.36	35,519	3,796,741
+	Canada	7.63	7.85	8.68	23,776	2,737,851
+	Singapore	4.79	6.43	7.33	18,030	2,459,479
+	Thailand	2.78	5.85	7.13	16,871	2,366,691
+	Indonesia	2.28	3.33	5.51	15,432	2,801,427
+	Philippines	1.95	2.49	4.20	13,711	3,262,737
+	Hong Kong, China	2.51	2.23	3.90	13,625	3,490,547
+	United Kingdom	8.21	8.62	9.34	13,536	1,448,790
+	Mexico	4.02	4.55	5.16	13,109	2,540,006
+	Germany	13	8.47	9.55	13,092	1,371,325
+	India	2.20	4.34	6.87	11,643	1,695,863
+	Iran (Islamic Republic of)	5.57	7.10	8.05	9,507	1,180,868
+	United Arab Emirates	3.20	5.66	5.19	9,159	1,765,606
+	Spain	10	7.00	7.32	9,064	1,238,902
+	Viet Nam	3.55	4.53	6.11	8,672	1,419,319
+	Netherlands	7.18	9.12	9.27	7,924	854,571
+	South Africa	5.00	6.50	6.40	7,239	1,131,859
+	Ukraine	5.86	5.86	5.65	6,478	1,147,016
+	Korea, Republic of	4.03	4.10	4.85	6,102	1,257,087
+	Panama	6.45	6.85	7.90	6,060	767,122
+	France	7.21	8.74	8.97	5,794	645,989

Sources: ITC calculations based on [General Customs Administration of China](#) statistics.