

Attn: Case Manager MS. Andrea Stone
MS. Danielle Rudolph

Operations 2
Anti-Dumping Commission
5 Constitution Avenue
Canberra Act 2601

**Re: Comments on Statements of Essential Facts and Proposal of Price
Undertaking relating to Antidumping and Countervailing Investigation into
Deep Drawn Stainless Steel Sinks Exported from The People's Republic of
China**

Dear Danielle and Andrea,

Please find the attached comments on SEF and the proposal of price undertaking. The narrative part of the Comments is not confidential, while Annex 1, 2, 3 and 5 are confidential information.

If you have any queries, don't hesitate to contact us.

Yours sincerely,

Lin Yang

Date: Jan 12 2015



**Zhongshan Jiabaolu Kitchen and Bathroom Products Co., Ltd,
Flowtech Co., Ltd and Zhongshan Flowtech Co., Ltd's
Comments on Statements of Essential Facts (No. 238) and the
proposal of price undertaking**

On behalf of Zhongshan Jiabaolu Kitchen and Bathroom Products Co., Ltd, Flowtech Co., Ltd and Zhongshan Flowtech Co., Ltd (collectively as "the Exporter"), we submit the following comments on the Statements of Essential Facts (No. 238) ("the SEF") issued by Australian Anti-Dumping Commission ("the Commission") on Dec 23 2014.

Although the Exporter welcomes the Commission's proposal to terminate the subsidy investigation as it relates to Jiabaolu, the Exporter also notices that the Commission rejects almost all major arguments of the Exporter relating to the dumping margin calculation, and still calculates a very high dumping margin 22.5%.

The Exporter respectfully submits that such high dumping margin does not fairly reflect the Exporter's real exports situation in Australia during the period of investigation. The Exporter is not engaged in any dumping behavior and such high dumping margin is due to the unreasonable calculation methodology used by the Commission which artificially increases the calculated dumping margin. The current high cash deposit rate is threatening to destroy the Exporter's existing exports to Australia. As a small-size companies, the Exporter will be facing an unbearable disaster if the current high dumping margin is confirmed in the final determination. The Exporter respectfully requests the Commission to give a full consideration on the following comments, revise its unreasonable methodologies and recalculate a fair dumping margin for the Exporter.

1. the Exporter's Business Model

In page 40 of the SEF, the Commission makes the following conclusion:

"The Commission considers that the operation of the business model described by Jiabaolu does not automatically preclude the goods exported to Australia from having been sold at dumped prices. The Commission's assessment as to whether the goods exported by Jiabaolu have been dumped is made based on the objective analysis of the company's relevant financial data. This analysis has been performed for the purposes of this SEF".

The Exporter fully agrees that "the operation of the business model described by Jiabaolu does not automatically preclude the goods exported to Australia from having been sold at dumped prices". The Exporter has no intention to say "there should be no dumping just because there is an exclusive supply arrangement".

The description of business model, i.e. the exclusive supply arrangement with its Australian customer, is to give an appropriate and useful background to the Commission, which will be very useful when assessing which methodology shall be used to restore the actual business situation of the Exporter. In this investigation, for some key issues which will be further discussed as below, there are several available methodologies before the Commission. Although the Commission has full discretion to decide which methodology shall be used, the business background could assist the Commission to choose a suitable methodology which can fairly restore the actual business situation, rather than an unreasonable methodology which will unfairly distort the actual business situation.

Since the beginning of its exports to Australia, the Exporter reaches an exclusive supply agreement with its sole Australian customer, it is NOT possible to the Exporter to enlarge its sales to Australian market by dumping its products, because neither the sales price (To the end user) nor the sales quantity is under the own control of the Exporter. Not like the exporters who are not subject to exclusive supply agreement, the Exporter has no incentives to lower its selling price to increase the exports to Australian market. This business background shall not be discarded when considering which available methodology shall be used.

The dumping margin calculation in this case is not common, because the calculation is not done just simply "based on the objective analysis of the company's relevant financial data" using the normal calculation method. Instead, some adjustment and assumption have to be made before starting the calculation, like "Discarding of model costs" and "Not backing out of accessories". The different methodology can either increase or decrease the calculated dumping margin. If only assessing these methodologies themselves, it is difficult to judge which one shall prevail. So at this time, it is very important to take the business model into consideration, and to ask whether the chosen methodology could restore the actual business situation, or distort the dumping margin calculation.

It is obvious that under the exclusive supply arrangement the exporter has no incentive to dump its products, because such behavior cannot lead to the increasing of sales quantity. Only for the exporter who was not bound by such exclusive supply arrangement, they would have the incentive to lower its exports price to obtain more purchase orders and market shares.

In page 24 of the Visit Report, the Commission observed that "a provision exists for prices to be adjusted in line with fluctuations in currency and stainless steel costs". And the relevant evidences have been provided in Attachment SALES 6, Attachment SALES 7, Attachment SALES 8 and Attachment SALES 9 of the Visit Report. According to these evidences, it is quite clear that the adjustment to exports price to Australia is only triggered by the fluctuating of stainless steel price, and such adjustment shall exactly reflect the increasing or decreasing of stainless steel cost and cannot be more or less. Except the adjustment caused by the fluctuating of stainless steel price, the Exporter never changes its exports price voluntarily due to any business strategy or price change of sinks market of Australia. That is to say, although the business model, i.e. the exclusive supply arrangement, cannot 100% preclude the goods exported to Australia from having been sold at dumped prices in a specific period, such dumping margin, even existed and calculated, cannot be such a high level, like the current margin 22.5%.

Please note that the exports of deep drawn sinks to Australia represent a high percentage of total sales of deep drawn sinks of the Exporter. The Exporter's business, especially exports sales, heavily relies on Australia market. This high percentage itself shows that the Exporter's sales to Australia have reasonable high profit, which enable the management willing to allocate more production and business resources to Australian market. If the dumping margin 22.5% reflected the real business situation, the Exporter would suffer a great loss, or the exports to Australia would be a very small percentage of total sales.

The current dumping margin 22.5% did not restore the actual business situation, instead it distorted the actual business situation. Such high dumping margin cannot occur under

the exclusive supply arrangement. Such high dumping margin is nothing but a combination of the adverse results of several calculation mythologies, like discarding of model costs, not backing out of accessories and using high profit ratio, which artificially adopted by the Commission but unfortunately not in favor of the Exporters.

Again, the Exporter respectfully requests the Commission to take the above business model into consideration, and choose the appropriate and reasonable calculation methodology which could fairly reflect the business reality of the Exporter.

2. the Offset of Stainless Steel Scrap

In page 130 of the SEF, the Commission makes the following conclusion:

“The GOC did not provide the Commission with the requested information in relation to the scrap steel market in China. In the absence of this information the Commission has had regard to other information available to it. The Commission is not satisfied there is sufficient positive evidence to warrant an adjustment to the scrap prices reflected in the records of Chinese manufacturers of deep drawn stainless steel sinks.”

The Exporters cannot agree to the above conclusion. For the offset of stainless steel scrap, there are two separate issues, one is “whether the offset reasonably reflect the costs associated with the production and sale of the product under consideration”, and the other is “whether the offset value shall be uplifted to MEPS price level to reflect adequate remuneration”.

Issue One: “whether the offset reasonably reflect the costs associated with the production and sale of the product under consideration”

It is the Commission’s understanding that if “these costs do not ‘reasonably reflect the costs associated with the production and sale of the product under consideration’ as provided for by Article 2.2.1.1”, the Commission has the ability to replace these costs with a reasonable substitute (See page 42 of the SEF). The following statements and facts have been presented and verified during the investigation and verification visit:

- Jiabaolu submitted that around 30 per cent of all stainless steel purchased for sink production is scrapped. (see page 18 of the Visit Report)
- The value of scrap sold in 2013 was supported by Jiabaolu’s ‘other business income’ sub-ledger for 2013, which showed the individual sales of scrap recorded by Jiabaolu during that period. This was supported by sales invoices for these sales of scrap. These documents form Confidential Attachment CTMS 14. (see page 51 of the Visit Report)
- Jiabaolu provided printouts from the webpage of the local scrap steel market showing the market scrap price of 304 stainless steel across the investigation period. These form Confidential Attachment CTMS 15. The Commission observed that the recorded market price of scrap from this website was significantly higher on a per tonne basis than that recorded by Jiabaolu in its accounts. (see page 52 of the Visit Report)
- at the beginning of its business with the customer, when negotiating the price adjustment formula, the customer understands that around 30% of inputted stainless steel will be wasted during the production process (the scrap ratio may vary among the different models), and such loss has been considered for fixing the price

adjustment formula. (see page 3 of the Comments on the Verification Visit Report)

According to Annex G-3.5 Sales of Waste and Scrap, which has been verified by the Commission, the average sales price of scrap in the Exporter's accounts is RMB 433 per ton, while the sale price of 304 steel scrap showed in the webpage of the local scrap steel market is consistently higher than RMB 10,000 per ton. This difference is significantly high, which shall not be discarded by the Commission intentionally. Due to this huge difference, the offset value used by the Exporter in its normal costing shall not be considered reasonably reflecting the costs associated with the production and sale of the product under consideration. In model cost examination, the Commission discarded the model cost of all models just because of cost spikes of few models in certain months, while in scrap offset examination, the Commission considers the above huge difference is accepted. The examination standard in two issues is arbitrary and inconsistent.

The Exporter respectfully requests the Commission to determine that the offset value used by the Exporter in its normal costing does not reflect the costs associated with the production and sale of the product under consideration, and replace it with the price of local scrap steel market.

The failure of Chinese government's cooperation in this issue shall not deprive the Exporter of this adjustment, because the Exporter itself has provided all necessary evidences to justify this adjustment and for calculating this adjustment.

Issue Two: "whether the offset value shall be uplifted to MEPS price level to reflect adequate remuneration"

In SEF, the Commission did not carry out a specific and separate investigation on Chinese stainless steel industry, instead, the Commission concludes that the cost of stainless steel is distorted by merely relying on the existence of government policies and industry regulations in the Chinese iron and steel industry as a whole (see page 123, 125 and 126 of the SEF). Especially in page 126 of the SEF, the Commission states "this definition of the Chinese iron and steel industry is broad, and extends from raw material mining, through to steel rollers and the production of steel products themselves. In light of this definition, the Commission considers it reasonable to find, at the very least, that manufacturers of stainless steel coil and their upstream manufacturers of steel and steel inputs are part of the iron and steel industry". (emphasis added by the Exporter)

The Exporter is confused with why the same reasoning cannot be applied to the scrap. It is undoubted that the stainless steel scrap shall be part of the iron and steel industry, as the definition of the iron and steel industry is broad. If the Commission has determined the government policies and industry regulations in the Chinese iron and steel industry as a whole can result in the cost distorting of stainless steel, why the same government policies and industry regulations cannot either directly or indirectly impacts on the domestic market for the scrap of stainless steel? Also, if the Commission's determination on Chinese stainless steel industry does not rely on the response from Chinese government, why the Commission's determination on Chinese stainless steel scrap market shall rely on the response from Chinese government? The market of stainless steel and scrap of stainless steel are strongly connected, and it will be totally illogical and unreasonable to conclude that one market is intervened by Chinese government while the other is not. Without any persuading evidences in the case record, such conclusion is totally incorrect.

Last, as said above, the Exporter would like to emphasize that the failure of Chinese government's cooperation in this issue will not preclude the Commission from adjusting the scrap offset of the Exporter either legally or practically. The investigation purpose on Issue Two is to decide whether MEPS benchmark price shall be used for uplift calculation. Even the investigation on Issue Two fails, the investigation on Issue One has already justified that an uplift adjustment to scrap offset is warranted, and all materials necessary for such uplift calculation have been provided and verified.

3. Discarding of Model Costs

After reviewing the reasoning and conclusion of the Commission in page 41 to 43 of the SEF, the Exporter would like to separate the relevant discussion into the following issues:

Issue One: the purpose of cost adjustment-Why a limited adjustment is necessary

The Exporter did not dispute that the Commission has the discretion to adjust the cost calculation during the investigation. However, the purpose of cost adjustment shall be to "reasonably reflect the costs associated with the production and sale of the product under consideration" as required by the Regulation and WTO ADA. In another word, the cost adjustment shall mitigate the existing unreasonableness, NOT aggravate the existing unreasonableness. This is the reason why the Exporter submits in the Comments on the Verification Visit Report that such adjustment shall be limited to the extent that the adjustment will not cause or enlarge any new unreasonableness.

The cost spike only occurs for few models in certain months. The influence of cost spike is limited in the dumping margin calculation. Such unreasonableness with limited influence can be corrected efficiently by several options of limited adjustment, like averaging the monthly cost of previous months, using the average cost of investigation period, or even deleting these models from the dumping margin calculation. Also the Exporter considers it is unfair and illogical to extend such adjustment to ALL models, while the cost spikes is resulted from the accounting corrections of SOME specific models. The advantage of a limited adjustment is to correct the existing unreasonableness without creating or enlarging any new unreasonableness, which is consistent with the requirement of the Regulation and WTO ADA.

Unfortunately, the Commission does not agree to the proposal of limited adjustment, instead, the Commission decides to redo the model cost of ALL models of the Exporter. Although the recalculated model cost mitigates the issue of cost spikes of SOME models, the recalculation will create more serious unreasonableness to ALL models which is due to semi-finished goods (see page 4 of the Comments on the Verification Visit Report) and backing out of accessories. The positive influence of recalculated model cost is totally overwhelmed by its negative influence.

Issue Two: reference to the business model

As discussed at the beginning, although the Commission has the full discretion to decide which calculation methodology shall be used, if there is several competing mythologies available to the Commission, the Commission shall choose the methodology which can appropriately restore the actual business situation. From the Exporter's view, the methodology of discarding the original model cost, non-backing out of accessories and

high profit ratio together contributes to the current high dumping margin to the largest extent. Under the exclusive supply arrangement, a high dumping margin shall not occur. The Exporter respectfully requests the Commission to adopt a limited adjustment to avoid any unreasonable and artificial distorting to original model cost.

Issue Three: how the limited adjustment can be done

According to Article 2.2.1 of WTO ADA, "If prices which are below per unit costs at the time of sale are above weighted average per unit costs for the period of investigation, such prices shall be considered to provide for recovery of costs within a reasonable period of time". A similar provision also exists in Australian Regulation.

So when conducting the below cost test, the domestic sales price will be compared to the per unit costs at the time of sale (quarterly cost) and the weighted average per unit costs for the period of investigation (POI cost). Even the cost spikes occur in certain months, such abnormal cost will be mitigated when calculating the quarterly cost, or even the cost spikes still exist in certain quarter, when doing the second step of below cost test, i.e. compared to the POI cost, such abnormal situation can be finally mitigated. It is not necessary to recalculate the model cost of ALL models which definitely will lead to a more serious cost distortion.

In page 43 of the SEF, the Commission especially states the usage of POI cost "does not satisfy the requirement to perform ordinary course of trade comparisons based on costs relating to particular sales at the point in time at which they were made, and hence cannot be accepted". The Exporter cannot agree to this conclusion. First, WTO ADA does not give a clear definition on what is "costs relating to particular sales at the point in time at which they were made". Either quarterly cost or POI cost is within the discretion of the investigation authority and consistent with WTO ADA. Second, in page 30 of Dumping and Subsidy Manual, 7.3 "Practice- Ordinary course of trade", it is stated **"The CTMS is generally calculated for each quarter of the investigation period. In some circumstances a monthly, or an annual, domestic CTMS may be used"**. It confirms that the Commission's own practice does not exclude the usage of POI cost. Last, as far as the Exporter knows, in other WTO members, like EU, Korea and India, normally only POI cost is used for below cost test. Due to the above, the Exporter respectfully submits the usage of POI cost to replace monthly cost with cost spikes shall not be excluded.

Last option but not least, the Commission can also simply delete any models or any monthly cost of any model with cost spikes from the calculation of quarterly cost and use the rest normal monthly cost to calculate the quarterly cost. Because only few models and months involving cost spikes, after deleting such models or monthly cost the rest normal monthly cost or model shall still be representative for the calculation of the quarterly cost.

4. 'Backing out' of accessories

After reviewing the reasoning and conclusion of the Commission in page 43 of the SEF, the Exporter would like to separate the discussion into the following issues:

Issue One: whether an apple to apple comparison is satisfied under the Commission's method

In page 43 of the SEF, the Commission considers “that there is no provision for it to divide the products sold by Jiabaolu to Australia into segments of sinks and accessories and conduct a dumping assessment based wholly on the sink itself, as the sink with accessories combined is intrinsically ‘the goods’ as a whole”. The Exporter cannot agree to this conclusion. In all WTO members’ antidumping investigation, an apple to apple comparison is a basic requirement. The most precise method to guarantee “an apple to apple comparison” is to artificially create “product control number” for each unique sink model and possible combination of accessories, for all products produced and exported to Australia as well as for those sold domestically. This method is quite common in US and EU investigations. Without the usage of “product control number”, the inclusion of accessories into the price comparison will result in a very imprecise calculation, which is totally inconsistent with “an apple to apple comparison”. The accessories cost is allocated into the domestically sold models only based on the product weight of each model. However, in actual business what accessories will be required for each transaction, varying among the different customers, or even the different transactions of the same customer, which is nothing to do with the product weight.

Issue Two: whether the Commission’s method is a more precise method

As stated in page 5 of the Comments on the Verification Visit Report, the current accessories allocation method used by the Commission considers the accessories difference among markets, so the CTMS for Australian sales is more precise than the original cost, however, the CTMS for domestic sales is still facing the serious misallocation of accessories cost. Even for the same product model, the accessories for domestic sales often vary among the different customers, or even the different transactions of the same customer. So the allocation of accessories cost among domestically sold models cannot solely be based on the product weight. The Commission’s method does not less the misallocation of accessories cost for domestic sales, which inevitably will increase the calculated profit ratio and dumping margin finally.

As discussed above, if there are several competing mythologies available to the Commission, the Commission shall choose the methodology which can appropriately restore the actual business situation.

Issue Three: ‘Backing out’ of accessories is a more precise method

“A dumping assessment based wholly on the sink itself” does not fail the investigation purpose. Although the product scope is deep drawn stainless steel sinks ‘whether or not including accessories’, the core target is sink itself only. This understanding is consistent with the industry’ reality, (1) Chinese exporters normally purchase all or most of accessories rather than produce them by themselves; (2) the price of sink and accessories are quoted separately to the customers, and the price adjustment to sink is normally according to the stainless steel price, which is not applicable to accessories. The inclusion of the accessories into the product scope just reflects the fact that most of sinks are sold with accessories, but does not mean that accessory is an independent and separate part of the product scope. So a dumping assessment based wholly on the sink itself does not conflict to the product scope of this investigation.

‘Backing out’ of accessories is just a method to guarantee a fair comparison. In page 58 of Dumping and Subsidy Manual, 14.2 “Due Allowance-Policy”, it is stated

“Adjustments will be made if there is evidence that a particular difference affects price comparability. Adjustments are made to normal value established under s 269TAC(1) and/or 269TAC(2)(c) (and in rare cases, s. 269TAC(4)(e)) in order to make a fair comparison with export prices”.

‘Backing out’ of accessories from both sales price and CTMS is just a necessary adjustment like the physical characteristics adjustment which guarantees the fair comparison, the backing out is based on the real purchase price of each kind of accessory, and is done manually for each transaction of exports to Australia and domestic sales. After backing out of accessories, the rest materials mainly stainless steel are allocated among the different models by product weight, which will not cause any distortion.

5. Profit Calculation

The Exporter would like to reiterate that the calculated high profit ratio is nothing to do with the real business situation, but just an artificial result of the choice of unreasonable methodologies, like low scrap offset, recalculation of model cost and inclusion of accessories, for example, as the Commission itself observed in the Exporter visit report, the recalculation of model cost and rejection of ‘back out’ accessories in fact result in the significant increasing of profit ratio. As discussed at the beginning, although the Commission has the full discretion to decide which calculation methodology shall be used, if there is several competing methodologies available to the Commission, the Commission shall choose the methodology which can appropriately restore the actual business situation. It is undoubted that the calculated high profit ratio cannot be achieved in the ordinary course of trade, which has been confirmed by the Exporter’s customer according to its long-term experience in Australian market.

In page 45 of the SEF, it is stated that “the Commission does not consider Jiabaolu’s request that the whole company’s profit figure be used as the constructed normal value profit to be reasonable in the circumstances. This profit necessarily includes profit for sales of products that were not the goods (particularly fabricated sinks, which make up a large proportion of Jiabaolu’s sales volumes) as well as sales to all markets (including exports). This profit can therefore not reasonably be considered to be reflective of the profit achieved on sales of like goods in the domestic market, which is the intended profit for constructed normal values”. In the email dated on Sep 28 2014, the Exporters has already pointed out that the profit ratio of fabricated sinks is higher than that of deep drawn sinks, and the profit ratio of exports (majority of exports goes to Australia) is higher than that of domestic sales, so the usage of the whole company’s profit figure is already higher than the actual profit figure of domestic sales of deep drawn sinks, which is adverse to the interests of the Exporter. The Commission has no reason to reject the usage of whole company’s profit figure.

Nevertheless, the Exporter also calculates the profit ratio of domestic sales of deep drawn sinks, by using the submitted and verified data. Please refer to Annex 1-Profit ratio by income statement-Domestic Sales of Deep Drawn Sinks. As expected, the profit ratio of domestic sales of deep drawn sinks is quite lower than the profit ratio of the whole company.

The Exporter respectfully requests the Commission to use either the whole company’s profit ratio or the profit ratio of Domestic Sales of Deep Drawn Sinks in Annex 1 for

constructing the normal value.

6. MEPS Price

The Exporter fully supports all arguments of GWA's submission on Dec 18 2014 relating to MEPS price. In this submission, GWA has provided price information from MEPS for the POI in relation to 304 stainless steel in Japan, Taiwan, South Korea and China, the Commission can easily determine a consolidated Asian benchmark that excludes the potentially distortive impact of Chinese steel prices from the calculation. GWA also provides the key evidence to prove that MEPS Asian market is the most relative market in terms of stainless steel used to produce the GUC. Due to these key evidences, the Exporter respectfully requests the Commission to recalculate the benchmark of MEPS price.

7. Price Undertaking

If the Commission still recommends an antidumping duty on imports from the Exporter in its final determination, the Exporter seeks to negotiate a price undertaking with the Commission. The Exporter notices that the Commission preliminarily rejects a price undertaking offer from another Chinese exporter Komodo. However, the Exporter does not believe the same reasons of rejection can be applied to itself.

- (1) the Exporter is subject to the exclusive supply agreement with its sole Australia customer. This business model is convenient to Australian customs to monitor the implementation of price undertaking;
- (2) the Exporter is not related to Australian customer, so the risk of circumventing does not exist;
- (3) currently the Exporter is selling only 22 models of deep drawn sinks to Australia. The number of models is limited, so it will not significantly increase any monitor burden. Please refer to Annex 2-Product Models subject to Price Undertaking.
- (4) the Commission has recommended to terminate the subsidy investigation on the Exporter, so only the dumping margin shall be considered when calculating the minimum imports price (MIP) of the price undertaking;
- (5) MIP is calculated by the formula: $MIP = \text{the most updated exports price} * (1 + \text{dumping margin})$. As verified by the Commission during the verification visit, the exports price is adjusted every four months according to the prevailing market price of stainless steel. All exports price used to calculate MIP is the most updated price, NOT the old price in POI. Please refer to Annex 3-Rise and Fall Calculation Sep 2014. All most updated exports price used to calculate MIP comes from Annex 3;
- (6) since the Exporter enters its agreement with Australian importer, the increasing of labor cost has never been considered when adjusting the exports price, only the price change of stainless steel will be considered. However, from 2008 to now, the labor cost has increased significantly. The average monthly wage of Zhongshan City where Jiabaolu is located is increased from RMB 1,382 of Year 2009 to RMB 2,080 of Year 2012. Please refer to Annex 4-Notification of Publishing the Average Wage of Employees in Zhongshan City. So the Exporter has strong incentive to increase its exports price under the price undertaking to cover such increased labor cost;
- (7) the Exporter further agrees to regularly adjust MIP according to the prevailing market price of stainless steel;
- (8) the Exporter voluntarily agrees to regularly report the detailed exports information

to the Commission and Australian customs to facilitate the monitor and verification

Please refer to Annex 5-Price Undertaking Proposal.

Submitted by:

Lin Yang

RayYin & Partners

杨鹿妍

Date: Jan 12 2015

Annex 4

Notification of Publishing the Average Wage of Employees in Zhongshan City

Notification of Publishing the Average Wage of Employees in Zhongshan City of Year 2009

For all employees in Zhongshan City, the annually average wage is RMB 16,588, monthly average wage is RMB 1,382

For all employees in urban area of Zhongshan City, the annually average wage is RMB 36,165, monthly average wage is RMB 3,014

Date: July 22 2010

The screenshot shows a web browser window displaying the official website of the Zhongshan City Human Resources and Social Security Bureau. The page features a header with the bureau's name in Chinese and English, along with a logo. Below the header is a navigation bar with links for '网站首页' (Home), '政务公开' (Government Openness), '网上服务' (Online Services), '互动交流' (Interactive Communication), '政策法规' (Policies and Regulations), and '统一名称服务电话: 12333'. The main content area displays a notice titled '关于公布2009年度中山市职工平均工资数据的通知' (Notice on Publishing the Average Wage Data of Zhongshan City Employees for 2009). The notice includes the following information:

- 发布时间: 2010-07-23 点击率: 76 来源:
- 火炬区管委会统计办, 各镇(区)统计办:
- 根据2009年度劳动工资统计结果, 现将2009年中山市职工平均工资、城镇单位在岗职工(不包括乡镇企业、私营企业和个体工商户)平均工资公布如下:
- 全市职工年平均工资为16588元, 月均为1382元。
- 城镇单位在岗职工年平均工资为36165元, 月均为3014元。

The notice is signed by the Zhongshan City Statistical Bureau on July 22, 2010. The browser window shows the URL 'www.gdzt.hrs.gov.cn/main/sgm/view/index.action?id=16724' and the page title '中山市人力资源和社会保障局'.

Notification of Publishing the Average Wage of Employees in Zhongshan City of Year 2012

For all employees in Zhongshan City, the annually average wage is RMB 24,956, monthly average wage is RMB 2,080

For all employees in urban area of Zhongshan City, the annually average wage is RMB 55,413, monthly average wage is RMB 4,618, among them for the employees in position, the annually average wage is RMB 55,480, monthly average wage is RMB 4,623

Date: May 23 2013

The screenshot shows a web browser window displaying the official website of the Zhongshan City Human Resources and Social Security Bureau. The page features a header with the bureau's name in Chinese and English, along with navigation links. The main content area contains a notice titled '关于公布2012年度中山市就业人员平均工资数据的通知' (Notice on Publishing the Average Wage Data of Zhongshan City Employees in 2012). The notice is dated 2013-06-03 and provides the following information:

火炬区管委会统计办, 各镇(区)统计办:

为方便各有关单位以及社会各界及时了解和运用平均工资数据, 按照《国家统计局关于进一步推进工资统计制度改革工作的意见》(国统字[2009]114号)规范平均工资数据发布的要求, 现将2012年中山市职工平均工资、城镇非私营单位就业人员以及在岗职工(不包括乡镇企业、私营企业和个体工商户)平均工资公布如下:

全市职工年平均工资为24956元, 月平均工资为2080元。

全市城镇非私营单位就业人员年平均工资为55413元, 月平均工资为4618元。其中, 在岗职工年平均工资为55480元, 月平均工资为4623元。

中山市统计局
2013年5月23日

打印 关闭