



14 May 2012

NON - CONFIDENTIAL

Ms Joanne Reid
Director, International Trade Remedies Branch
Australian Customs and Border Protection Service
Customs House
5 Constitution Avenue
Canberra ACT 2600

Dear Ms Reid,

**STATEMENT OF ESSENTIAL FACTS NO. 181 - ALUMINIUM ROAD WHEELS
FROM CHINA**

This submission, made on behalf of Mullins Wheels Pty Ltd ("Mullins"), refutes Customs' preliminary finding per Statement of Essential Facts No. 181 ("the SEF") that dumping and subsidisation of aluminium road wheels ("ARWs") from China caused material injury to the Australian industry.

Summary

Customs' preliminary conclusion that dumped and subsidised imports from China caused material injury to the Australian industry producing ARWs is unsustainable because of serious flaws in several findings leading to this conclusion.

The SEF provides no basis for Customs' finding that the injury that it has attributed to dumped and subsidised imports from China is "material".

Customs appears to have attributed injury caused by factors occurring outside the investigation period ("the IP") to dumped and subsidised imports from China.

Because of the significance of OEM sales to Arrowcrest's ARW business (>94% of sales) and the insignificance of AM sales to Arrowcrest's ARW business (<6% of sales), for price suppression to have a material impact on Arrowcrest's economic performance in respect of ARWs, it would need to occur in OEM sales. Any price suppression in AM sales would have a negligible impact on Arrowcrest's economic performance in respect of ARWs. Arrowcrest's prices in the OEM segment were not suppressed by dumped and/or subsidised imports during the IP because they were fixed by contracts entered into prior to the IP. Consequently, Arrowcrest could not have experienced material injury in the form of price suppression because of dumped and/or subsidised imports.

Arrowcrest's material loss of sales volume during the IP was obviously caused by its material loss of sales volume to its principal customer, Toyota, because of Toyota's substantial downturn in passenger motor vehicle production during the IP (about 13%). Any contribution to Arrowcrest's overall loss of sales by loss of sales in the AM during the IP would have been negligible. Consequently, Arrowcrest could not have experienced material injury in the form of lost sales because of dumped and/or subsidised imports.

Concerning the other key injury form of loss of profit and profitability, which Customs has erroneously attributed to dumped and subsidised imports because of price suppression and higher unit costs due to lower production volumes, –

- (a) any price suppression because of dumped and subsidised imports during the IP can only have occurred in the AM segment and could not have had a significant impact on overall profit and profitability. Prices in the OEM segment, the segment which dominates Arrowcrest's ARW business, were not suppressed by dumped and subsidised imports during the IP as they were fixed by contracts entered into prior to the IP; and
- (b) Arrowcrest's lower production volumes, which caused increased unit costs and hence reduced profit and profitability during the IP, were because of Arrowcrest's loss of sales volume on account of Toyota's substantial downturn in passenger motor vehicle production. Any increase in average unit costs because of Arrowcrest's loss of sales in the AM segment would have been negligible.

In reaching its conclusion of material injury caused by dumped and subsidised imports from China, Customs failed to adequately analyse the extent of injuries caused by factors other than dumped and subsidised imports and erroneously attributed these injuries caused by other factors to dumped and subsidised imports.

Materiality of injury

One of several flaws in the SEF is Customs' preliminary finding that the Australian industry experienced *material* injury in the listed forms when the SEF provides no basis for a finding that the injury experienced in the said forms by the Australian industry is material.

Section 4.2 of Customs' Dumping and Subsidy Manual ("the Manual") defines material injury as injury which is not immaterial, insubstantial or insignificant and is greater than that likely to occur in the normal ebb and flow of business.

The key injury forms found by Customs in this case are price suppression, lost sales volume and lost profit and profitability. The SEF includes no facts established by Customs which demonstrate that injury experienced by the Australian industry in these forms is not immaterial, insubstantial or insignificant. Similarly, the SEF includes no facts demonstrating that the said injury is greater than that likely to occur in the normal ebb and flow of business.

In section 8.6 of the SEF Customs notes that –

- because during the injury analysis period 94% of Arrowcrest's sales were to the OEM segment, the average OEM price followed the same trend as the overall unit price.

Consequently, for any overall price or price-related profit injury experienced by Arrowcrest to be "material", such injury must have occurred in the OEM segment.

Similarly, because of the dominance of sales to the OEM segment, for any overall volume or volume-related profit injury to be "material", it must be such injury experienced by Arrowcrest in the OEM segment.

We note that the abovementioned proportion (94%) of Arrowcrest's overall sales to the OEM segment is the proportion during the "injury analysis period". Because, according to table 3 in section 8.7.1 of the SEF, Arrowcrest's OEM sales increased and its AM sales decreased during the injury analysis period, OEM sales would have represented > 94% of Arrowcrest's overall sales during the IP. Being <6% of its overall sales, any injury experienced by Arrowcrest in the AM segment would have negligible impact on its overall economic performance.

Price suppression

According to Article 3.2 of the WTO Anti-Dumping Agreement ("the Agreement"), price suppression is the prevention of price increases which would otherwise have occurred, to a significant degree.

Section 4.3 of the Manual refers to the following indicators of price suppression:

- Prices not having increased at the same rate as cost increases; and
- The Australian industry's prices being lower than those that may have been achieved in the absence of dumping.

Customs' examination of Arrowcrest's sales price and cost trends during the injury analysis period according to section 8.6 of the SEF **did not** establish that –

- (a) Arrowcrest's overall prices during the investigation period (IP), ie FY 2011, did not increase at the same rate as cost increases; and
- (b) Arrowcrest's overall prices were lower during the IP than those that may have been achieved in the absence of dumped/subsidised imports from China.

That is, the price suppression indicators per section 4.3 of the Manual were not found by Customs.

Concerning (a) above, in section 8.6 Customs found that Arrowcrest's overall unit prices increased *marginally* during the IP and its unit cost rose *slightly* during the IP and that, except for FY 2009, Arrowcrest's overall average price closely followed the CTMS line during the injury analysis period, which includes the IP. In section 9.4.2 of the SEF Customs found that unit prices were above unit costs in 2010 and 2011.

With regard to (b) above, because of the dominance of OEM sales in its ARW business (>94%), Arrowcrest's overall prices can only have been meaningfully lower during the IP than those that may have been achieved in the absence of dumped/subsidised imports from China if its prices in sales to the OEM segment were lower during the IP than those that may have been achieved in the absence of dumped/subsidised imports from China. That is, any meaningful overall price suppression experienced by Arrowcrest during the IP can only be because of suppression of its prices in the OEM segment. Any price suppression in the AM segment would have had a negligible impact on Arrowcrest's overall price suppression. It is of note in this context that Customs found in section 8.6 of the SEF that Arrowcrest did not suffer price depression during the IP in relation to its overall price because *its sales to the AM are low compared to total sales*.

It is not possible that Arrowcrest's OEM prices were suppressed by dumped/subsidised imports from China during the IP, as Arrowcrest's sales to the OEM segment are contract based. Prices in OEM sales during the IP were fixed by contracts entered into prior to the IP and any variations during the IP could only have been by reason of contractual rise/fall provisions, eg aluminium LMF price variations or other cost related factors. Prices in OEM sales could not have been influenced by prices of imports from China during the IP.

In its submission of 14 March 2012 concerning unsuppressed selling price, Arrowcrest submits that the profit/profitability on sales of ARWs to HSV in FY 2011 is unaffected by dumping, is market determined and could be achieved in the absence of dumping. This conclusively proves that prices in sales to HSV during the IP were not suppressed by dumping and/or subsidisation.

We note Customs' statement in section 9.4.2 of the SEF to the effect that some major AM customers of the Australian industry multi-source ARWs from both China and the Australian industry, which provides them with considerable leverage over the Australian industry. Because of the insignificance of Arrowcrest's AM sales (<6% of overall sales), any reductions in Arrowcrest's AM prices in response to price pressure from imports from China cannot be the cause of overall price suppression experienced by Arrowcrest during the IP. As found by Customs, Arrowcrest's overall unit price trend is in line with its OEM price trend because of the insignificance of AM sales.

In support of its SEF section 9.4.2 conclusion re price suppression, Customs refers to evidence provided by Arrowcrest to the effect that Chinese prices were used in negotiations with one customer to reduce a price increase proposed by Arrowcrest. If this customer is an AM customer, for reasons outlined above, such reduction of a price increase proposed by Arrowcrest cannot be considered suppression of Arrowcrest's overall ARW prices. If this customer is an OEM customer, the reduction of the proposed increase must have occurred prior to the IP as Arrowcrest's prices to OEM customers during the IP were fixed by contracts entered into prior to the IP.

Furthermore, the "other relevant evidence, listed at section 9.4.1", claimed by Customs in section 9.4.2 to support Arrowcrest's claim of price suppression caused by Chinese ARWs, is in relation to either irrelevant AM pricing (to Bob Jane) or irrelevant pricing to OEM customers prior to the IP (Toyota and Suzuki).

Customs' preliminary finding per section 8.6 of the SEF that the Australian industry suffered price suppression during the IP, acknowledges that it is price suppression in the OEM segment that has a material impact on Arrowcrest's revenue, profit and profitability, ie it is price suppression in the OEM segment that has a material impact on Arrowcrest's overall price suppression. We reiterate that Arrowcrest's prices in OEM sales were not suppressed during the IP as they were fixed by contracts entered into prior to the IP. Consequently, Arrowcrest did not experience material injury in the form of price suppression during the IP.

Loss of sales volume

The facts established by Customs in relation to loss of sales volume do not support a finding that Arrowcrest's loss of sales volume during the IP is material injury caused by dumped and subsidised ARWs from China.

It is paramount to the consideration of whether Arrowcrest's loss of sales volume during the IP is material injury caused by dumped and subsidised ARWs from China, that Arrowcrest's sales in the OEM segment constituted >94% of its overall sales during the IP and its sales to in the AM segment <6%. This means that Arrowcrest's loss of volume in the AM segment is insignificant and it is only loss of volume in the OEM segment which can be the cause of material injury in the form of overall loss of sales volume.

Tables 2 and 3 in section 8.7.1 of the SEF demonstrate that -

- (a) Arrowcrest's overall loss of sales volume during the IP is the same as its loss of OEM sales volume;
- (b) Arrowcrest's loss of AM sales volume during the IP is <1% of Arrowcrest's overall loss of sales volume when it is taken into account that AM sales are <6% of overall sales; and
- (c) the OEM segment of the Australian market decreased by a substantially greater volume than Arrowcrest's loss of sales volume overall and in the OEM segment during the IP (27% v 6%).

It is clear from the above that Arrowcrest's overall loss of sales volume is essentially due to its loss of sales volume in the OEM segment. Any loss of sales volume in the AM segment is insignificant to the overall loss of sales volume.

The downturn in the Australian OEM segment is substantially greater than Arrowcrest's decrease in overall (and OEM) sales volume during the IP, making it clear that Arrowcrest's overall loss of sales volume during the IP was primarily caused by this substantial downturn in the Australian OEM segment during the IP.

It is paramount that the principal cause of the substantial downturn in the Australian OEM segment during the IP is the substantial downturn in passenger motor vehicle production by Arrowcrest's principal customer, Toyota, during the IP.

Toyota's production of passenger motor vehicles reduced by 14,991 vehicles (about 13%) from FY 2010 to FY 2011 (refer to attachment A). This represents a reduced requirement of 59,964 ARWs from Arrowcrest during the IP. This reduced requirement of 59,964 ARWs by Toyota represents a reduction of about 16% of Arrowcrest's overall ARW sales volume during the IP. According to table 3 in section 8.7.1 of the SEF, Arrowcrest's reduction of its overall ARW sales volume in FY 2011 was about 6%. That is, Arrowcrest's loss of sales volume to Toyota because of Toyota's downturn in production of passenger motor vehicles is substantially greater than its overall loss of sales volume during the IP. It is patently obvious that Arrowcrest's overall loss of sales volume during the IP is by reason of Toyota's substantial reduction of passenger motor vehicle production.

It is quite incredible that the extent of Arrowcrest's substantial loss of sales volume to its principal customer, Toyota, during the IP, ie about 16% of its overall sales volume, barely rates a mention in the SEF. There is just one sentence, *Sales volume to Toyota decreased in the investigation period*, in section 8.7.1. It gets no mention at all in section 9.5, where the focus is on insignificant matters of loss of sales volume in the AM segment and Arrowcrest's failure to win a Holden tender for a particular model, nor in section 9.8.1 in which Customs

reaches the irrelevant conclusion that Arrowcrest's reduction in sales volume during the investigation period was greater than the reduction in overall market size.

Customs' finding per section 9.5.1 of the SEF that, but for the dumping and subsidisation Arrowcrest could have regained some volume in the AM during the IP, is purely speculative and has no regard for the fact that there are several non-price factors which impact on purchase decisions in the AM sector. These non-price factors are discussed later in this submission.

When the impact of the substantial downturn in Toyota's passenger motor vehicle production on Arrowcrest's dominant OEM sales and the insignificance of Arrowcrest's AM sales during the IP are taken into account, it is impossible to find that the injury experienced by Arrowcrest through loss of sales volume is material injury caused by dumped and subsidised imports from China.

Customs found in section 8.7.1 of the SEF that Arrowcrest's volume to its other OEM customer, HSV, also decreased in the investigation period, but the full impact of this loss of volume was not seen until after the IP. The decrease occurring after the IP cannot be attributed to dumping and subsidisation. Furthermore, Arrowcrest's loss of sales volume to HSV is caused by a number of factors other than dumping and subsidisation. This matter is discussed later in this submission.

Loss of profit and profitability

It is Customs' policy per section 4.2 of the Manual that *material injury, or the threat thereof, will only be rarely taken as proven when the Australian industry producing like goods has not suffered, or is not threatened with, a "material" diminution of profits*. Customs reached a preliminary conclusion that Arrowcrest suffered injury in the form of reduced profit and profitability (section 8.8 of the SEF), but it did not find that Arrowcrest's reduced profit was "material", ie not immaterial, insubstantial or insignificant.

It is paramount that, even if Customs were to find that Arrowcrest's diminution of profits during the IP was "material", such "material" diminution cannot be attributed to dumped and subsidised imports from China.

Customs rationalises its finding that *dumping and subsidisation has caused the Australian industry to lose profits and profitability* per section 9.6 of the SEF as follows:

- *The Australian industry's reduced profit and profitability is a function of a loss of volume and suppressed prices in the investigation period;*
- *Lost sales volume during the investigation period was attributable to dumped or subsidised imports; and*
- *Australian industry prices were suppressed as a result of price competition from dumped or subsidised goods exported from China.*

It is conclusively demonstrated by this submission that –

- (a) Arrowcrest's overall loss of sales volume during the IP was not attributable to dumped or subsidised imports from China, it was caused by a loss of sales volume to

its major customer, Toyota, because Toyota's production of passenger vehicles decreased substantially during the IP; and

- (b) prices in Arrowcrest's OEM sales during the IP, which constitute >94% of its overall ARW sales, were fixed by sales contracts entered into prior to the IP and could not have caused price suppression by reason of price competition from dumped or subsidised imports from China. And because AM sales constituted <6% of Arrowcrest's overall ARW sales during the IP, any overall price suppression experienced by Arrowcrest as a result of price competition from dumped or subsidised imports in the AM market would be negligible.

Consequently, if Customs were to consider that Arrowcrest's overall reduced profit and profitability represents a "material" diminution of profit, such reduced profit and profitability cannot be attributed to dumped or subsidised imports. Customs conclusion that dumping and subsidisation caused the Australian industry to lose profits and profitability is based on the false premise that Arrowcrest's lost sales volume and experienced price suppression during the IP because of dumped or subsidised imports from China.

Other injury factors

Customs reached a preliminary finding in section 8.11.9 of the SEF that Arrowcrest had suffered injury in the form of reduced capacity utilisation, employment and return on investment.

Customs has attributed Arrowcrest's reduced capacity utilisation to dumped and subsidised imports from China on the false premise that Arrowcrest's loss of sales volume and consequent increased average fixed costs during the IP were caused by dumped and subsidised imports from China. It is conclusively demonstrated by this submission that dumped and subsidised imports were not the cause of Arrowcrest's loss of sales volume during the IP.

While Customs found that Arrowcrest also suffered injury in the form of reduced employment and return on investment, it has not discussed whether these injury factors were caused by dumped or subsidised imports. Both are actually also attributable to Arrowcrest's reduced sales volume which was not caused by dumped or subsidised imports.

We also note that in its preliminary injury finding per section 1.3.4 of the SEF, Customs has included an injury form of lost revenue, but has not rationalised this finding or attributed it to dumped or subsidised imports in the SEF. Any material loss of revenue during the IP will have been caused by loss of sales volume and price suppression, neither of which are attributable to dumped or subsidised imports from China.

Other causes of injury

It is conclusively demonstrated by the foregoing that Arrowcrest did not suffer material injury because of dumped and/or subsidised imports from China.

We reiterate that because of the insignificance of Arrowcrest's AM sales to its overall ARW sales, for any injury experienced by Arrowcrest during the IP to be material, it must be injury experienced in the OEM segment. Because Arrowcrest's OEM prices during the IP were not

suppressed by dumped or subsidised imports and because dumped or subsidised imports were not the cause of Arrowcrest's loss of sales volume during the IP, Arrowcrest's overall loss of profit and profitability must have been caused by other factors.

The key other factor is Arrowcrest's loss of sales volume in the OEM segment during the IP and its impact on Arrowcrest's profit and profitability during the IP. As demonstrated above, Arrowcrest's loss of sales volume in the OEM segment was due to –

- (a) Toyota's substantial downturn in passenger motor vehicle production during the IP; and
- (b) to a lesser extent, HSV's decision to reduce the volume of ARWs sourced from Arrowcrest for reasons other than price, eg its preference for wheels produced by the cast flow and forging processes and its concern with the styles and quality of ARWs supplied by Arrowcrest.

Concerning HSV's non price-related reasons for reducing the volume of its purchases from Arrowcrest, which was clearly outlined in Customs Visit Report re HSV, it is of no relevance that Arrowcrest disagrees with HSV's reasons for its preference for wheels produced by other than the process employed by Arrowcrest and its concern with Arrowcrest's styles and quality. It is only relevant that HSV has reduced the volume of its purchases from Arrowcrest for these reasons (actual or perceived).

While it did not impact on Arrowcrest's loss of sales volume during the IP, other major OEM customers Ford and GM Holden gave Customs similar non price-related reasons for no longer sourcing ARWs from Arrowcrest. It is for these reasons it is unlikely that Arrowcrest will resume supply to these customers in the foreseeable future, rather than the relativity of prices of ARWs from China to those from Arrowcrest. It matters not that Arrowcrest disagrees with Ford and GM Holden's reasons for not sourcing from them.

While Arrowcrest's performance in the AM sector during the IP had negligible impact on its overall performance in respect of ARWs, it is disappointing that Customs summarily dismissed other injury factors in the AM segment, such as insufficient new designs introduced by Arrowcrest into a market in which wheel style has a significant bearing on purchase decisions and Arrowcrest's insufficient commitment of resources to sales, marketing and distribution services in this segment, on the grounds that there was insufficient evidence of them. It is of note that all participants in the AM segment who participated in this investigation (other than the Australian industry) made the same claims in this regard.

In section 9.9 of the SEF Customs has acknowledged that Arrowcrest did experience injury because of factors other than dumped or subsidised imports from China by finding that –

- *the Australian industry has experienced injury that may have been in part caused by factors other than dumped or subsidised goods exported from China; and*
- *dumped and subsidised goods exported from China also caused material injury to the Australian industry. (Emphasis added).*

That Customs has not analysed the extent of the injury caused by factors other than dumping or subsidisation in reaching its conclusion that *dumping and subsidisation, of itself, has caused material injury to the Australian industry*, is a serious flaw in that conclusion.

Without such analysis it is not possible to conclude that dumping and/or subsidisation have caused "material" injury. One of such other factors, Toyota's substantial downturn in production of passenger motor vehicles, obviously had a material negative impact on Arrowcrest's economic performance during the IP.

Customs has provided no rationale for its conclusion in section 9.9 that, notwithstanding its finding that injuries have been caused by other factors, injury in the form of reduced sales volumes, suppressed prices and consequent reduced profits and profitability caused by dumped and subsidised imports from China is, of itself, "material". Customs has not provided an objective basis for concluding that, after excluding the other known factors that caused injury, dumping and subsidisation caused "material" injury.

Customs is well aware of the WTO jurisprudence which provides that in the absence of the separation and distinction of the injurious effects of factors other than dumped (or subsidised) imports, they have no rational basis to conclude that dumped (or subsidised) imports caused injury which is, of itself, material (*US - Anti-dumping measures on certain hot-rolled steel products from Japan AB-2001-2*). **Why then has Customs not analysed the effect of the material loss of sales volume to Toyota during the IP, for reasons unrelated to dumping or subsidisation, on Arrowcrest's overall loss of sales volume, reduced sales revenue, increased unit costs and reduced profit and profitability, when such effect would obviously have been significant?** Such analysis would not be difficult.

Section 9.5.2 of the SEF concerning Arrowcrest's unsuccessful tender to supply Holden ARWs for a particular model ("Cruze") illustrates Customs' attribution of injury caused by other factors to dumping or subsidisation. Notwithstanding Holden's averment, consistent with that of several other interested parties, that Arrowcrest was unsuccessful in Holden's competitive and qualitative tender process for a number of non price-related reasons, eg quality and reliability of supply issues, Customs made the subjective finding that, because price would have been an "important" factor, Arrowcrest's failure to achieve success in this tender process is because of dumped and subsidised imports. Customs has provided no objective basis for its finding that the factor of price was more influential on Holden's purchase decision than the other non-price factors considered by Holden. It is of note that this Arrowcrest lack of success in the said Holden tender is the sole factor relied upon by Customs in reaching its preliminary finding that Arrowcrest's loss of sales volume in the OEM segment was caused by dumped and subsidised imports per section 9.5.3 of the SEF. There is no discussion on the materiality of the impact of this loss of sales volume on Arrowcrest's overall loss of sales volume during the IP. It is of note in this context that Holden did not commence production of its "Cruze" model until March 2011.

Contrary to its obligations under s269TAE (2A) of the Act and Article 3.5 of the Agreement, Customs has attributed injury caused by other factors, eg Toyota's substantial downturn in passenger motor vehicle production, to dumped and subsidised imports in reaching the conclusion that dumped and subsidised imports caused "material" injury.

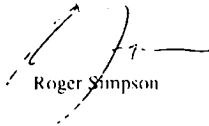
Conclusion

It is conclusively demonstrated by this submission that dumping and subsidisation of ARWs from China did not of itself cause material injury to the Australian industry. Consequently this investigation must be promptly terminated vide ss269TDA (13) and (14) of the Customs Act.

Closing Comment

While it may be in line with the prevailing political climate, an approach of *dumping + injury* = *material injury caused by dumping* (Xenophon's theorem) is inconsistent with Australia's statutory and international treaty obligations. It is inconsistent with these obligations to attribute injury caused by other factors to dumping (or subsidisation). It is fundamental to anti-dumping and anti-subsidy disciplines that to be actionable, dumping and/or subsidisation must be demonstrated to be the cause of material injury to a domestic industry.

Yours sincerely,



Roger Simpson

ATTACHMENT A

TOYOTA AUSTRALIAN PRODUCTION STATISTICS

Toyota Australian Production Statistics

Financial Years	Total	Camry
July to December 2009	55962	42198
January to June 2010	62335	51080

Financial Year 2010	118297	93278
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July to December 2010	57106	44891
January to June 2011	46200	37046

Financial Year 2011	103306	81937
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Quantity Change Year on Year	14991	11341
% Change Year on Year	12.7%	12.2%

Source: FAPM Australian Monthly Production Data (attached)

TOYOTA TOTAL LOCAL PRODUCTION PER MARQUE 2009

Domestic plus Exports

2009	CAMRY	AURION	TOTAL PROD
January	4550	1068	5618
February	7462	1614	9076
March	6313	1409	7722
April	2951	1247	4198
May	4436	2216	6652
June	6147	1502	7649
July	6757	1250	8007
August	4116	3459	7575
September	7237	2397	9634
October	7990	2790	10780
November	8164	2180	10344
December	7934	1688	9622
Total	74057	22820	96877

TOYOTA TOTAL LOCAL PRODUCTION PER MARQUE 2010

Domestic plus Exports

2010	CAMRY	AURION	TOTAL PROD
January	5715	1610	7325
February	9609	1825	11434
March	10418	2095	12513
April	7906	1979	9885
May	9640	1930	11570
June	7792	1816	9608
July	7962	1997	9959
August	7669	2136	9805
September	7956	2053	10009
October	7394	2223	9617
November	8061	2320	10381
December	5849	1486	7335
Total	95971	23470	119441

TOYOTA TOTAL LOCAL PRODUCTION 2011

Domestic plus Exports

2011	CAMRY	AURION	TOTAL PROD
January	5114	1306	6420
February	7054	1615	8669
March	8052	2039	10091
April	5611	1292	6903
May	4395	1178	5573
June	6820	1724	8544
July	8054	1927	9981
August	8503	2809	11312
September	4407	2049	6456
October	2466	1006	3472
November	7158	9	7167
December	9139	19	9158
Total	76773	16973	93746

Federation of Automotive Products Manufacturers



AUSTRALIAN MONTHLY PRODUCTION DATA

FOR TOYOTA, FORD & GM HOLDEN

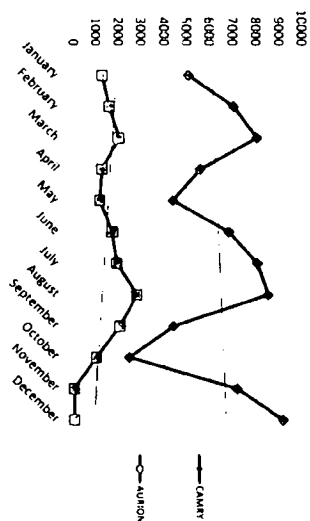
December 2011

TOYOTA TOTAL LOCAL PRODUCTION 2011 Domestic plus Exports

Month	CAMRY	AURION	TOTAL PROD
January	5114	1306	6420
February	7054	1615	8669
March	8052	2039	10091
April	5611	1292	6903
May	4395	1178	5573
June	6820	1724	8544
July	8054	1927	9981
August	8503	2809	11312
September	4407	2049	6456
October	2466	1006	3472
November	7158	9	7167
December	9139	19	9158
Total	76773	16973	93746

Grand Total 93746

Total Toyota Production YTD 2011



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**AUSTRALIAN MONTHLY PRODUCTION DATA
FOR TOYOTA, FORD & GM HOLDEN**

December 2010

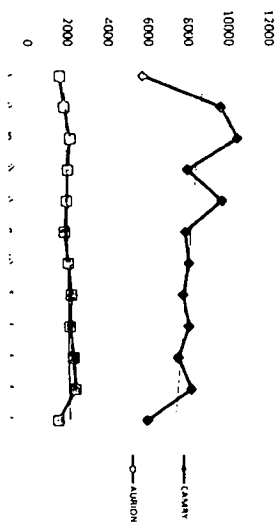
TOYOTA TOTAL LOCAL PRODUCTION PER MARQUE 2010

Domestic plus Exports

Month	CAMRY	AURION	TOTAL PROD
January	5715	1610	7325
February	9609	1875	11484
March	10418	2095	12513
April	7906	1979	9885
May	9640	1930	11570
June	7792	1816	9608
July	7962	1997	9959
August	7669	2136	9805
September	7956	2053	10009
October	7394	2223	9617
November	8061	2320	10381
December	5849	1486	7335
Total	95971	23470	119441

Grand Total

:19441



Total Toyota Production YTD 2010

Grand Total Local Production 2010

