



Australian Industry Questionnaire

Case number: 651

Product: Silicon Metal

From: People's Republic of China

Inquiry period: 1 July 2023 to 30 June 2024

Response due by: 8 August 2024

Return completed questionnaire to: investigations2@adcommission.gov.au

Why you have been asked to complete this questionnaire?

The Anti-Dumping Commission (the commission) is currently undertaking an inquiry into whether anti-dumping measures applying to exports of silicon metal (the goods) from the People's Republic of China (China) should be continued.

Australian Dumping Notice No. 2023/042 provides details of the goods under consideration, the application, and the inquiry procedures.

The commission is seeking further information from Australian industry for the goods to inform its:

- understanding of the dynamics of the Australian market, including factors that may be impacting the economic condition of the Australian industry producing the goods; and
- assessment of whether the expiration of the anti-dumping measures applying to the goods would lead, or would be likely to lead, to a continuation of, or a recurrence of, the dumping and subsidisation, and the material injury that the anti-dumping measures are intended to prevent.

The commission will collect and use information in accordance with the commission's Collection and Use of Information Policy.

The timeliness of your response is important. If you are unable to meet the due date specified above, please contact the commission.

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Confidential and non-confidential versions

If you elect to respond to this questionnaire, you are required to lodge a confidential and a non-confidential version of your submission by the due date.

In submitting these versions, please ensure that each page of the information you provide is clearly marked either “**IN-CONFIDENCE**” or “**NON-CONFIDENTIAL**” in the header and footer.

All information provided to the commission in confidence will be treated accordingly. The non-confidential version of your submission will be placed on the Public Record, which all interested parties can access.

Your non-confidential submission must contain sufficient detail to allow a reasonable understanding of the substance of the confidential version. If, for some reason, you cannot produce a non-confidential summary, contact the investigation case officer (see contact details on Page 1 of this questionnaire).

Declaration

You are required to make a declaration that the information contained in your response is complete and correct. You must return the signed declaration of an authorised person at end of this questionnaire with your response.

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A-1 Company information

- i). Please provide details of any other business names you use to manufacture/produce/sell the goods that are the subject of this inquiry.

Not applicable.

2. Provide your company's internal organisation chart. Describe the functions performed by each group within the organisation.

Refer Confidential Attachment A-1.2.

3. List the major shareholders of your company. Provide the shareholding percentages for joint owners and/or major shareholders.

Simcoa Operations Pty Ltd (**Simcoa**) is 100 percent owned by the Silicon Metal Company of Australia Pty Ltd (ABN: 73 009 401 736).

4. If your company is a subsidiary of another company list the major shareholders of that company.

The Silicon Metal Company of Australia Pty Ltd is 100 percent owned by the Japanese Shin-Etsu Chemical Co., Limited.

5. If your parent company is a subsidiary of another company, list the major shareholders of that company.

Shin-Etsu group is listed on Tokyo stock exchange.

6. Provide an outline diagram showing major associated or affiliated companies and your company's place within that structure (include the ABNs of each company).

Refer Confidential Attachment A-1.6.

7. Are any management fees/corporate allocations charged to your company by your parent or related company?

[Confidential text deleted: management fee details].

8. Identify and provide details of any relationship you have with an exporter to Australia or Australian importer of the goods.

[Confidential text deleted: Simcoa import activities].

9. Provide a copy of the two most recent annual reports (if relevant). Also provide copies of relevant brochures or pamphlets on your business activities.

Simcoa does not prepare an annual report. The company does prepare special annual financial statements. Please refer to Confidential Attachments A-1.9.1 and A-1.9.2.

10. Provide details of any relevant industry association.

Simcoa is a member of the Chamber of Commerce and Industry, Western Australia.

A-2 The imported and locally produced goods

1. Fully describe your product(s) that are 'like' to the imported product:

- Include physical, technical or other properties.
- List this information for each make and model in the range.
- Supply technical documentation where appropriate.
- Indicate which of your product types or models are comparable to each of the imported product types or models. If appropriate, the comparison can be done in a table.

Simcoa has continued to produce the same type of silicon metal goods as has been assessed by the Anti-Dumping Commission (**the Commission**) in earlier trade remedy inquiries – the most recent being Continuation No. 524 (**CON 524**). In the final report to CON 524 (**REP 524**), the Commission referenced the earlier findings in *Anti-Dumping Commission Report No. 237 (REP 237)* and concluded as follows on Simcoa's locally produced like-goods:¹

Physical likeness

The goods and locally produced goods have identical physical characteristics, notwithstanding slight variations in technical specifications based on customer needs. Silicon is a chemical element, of metallic appearance and steel grey in colour. It is often referred to as a metal, although silicon possesses characteristics of both metals and non-metals (silicon is a metalloid). It is generally sold in lump form to the metallurgical industry, and in powder form to the chemicals industry. The type and level of impurities influences the end-use application.

Commercial likeness

The goods and locally produced goods compete in the same market sector, are interchangeable and use similar distribution channels. Silicon metal is sold and distributed across Australia, sourced either from Simcoa or imports. There is no geographic segmentation for silicon metal, nor is there product segmentation other than identifying whether product is sold to primary or secondary aluminium end-users.

Functional likeness

The goods and locally produced goods are functionally alike as they have similar end-uses. Silicon metal is sold to primary aluminium and secondary aluminium end-users as an alloying agent and by the chemical industry to produce silicones and photovoltaics.

Production likeness

The goods and locally produced goods are produced in the same manner, using the same raw material inputs and manufacturing processes. Silicon metal is manufactured from inputs including quartz or silica, charcoal, coal and wood chips involving a high endothermic process.

¹ REP 524, p. 11-12.

Conclusion

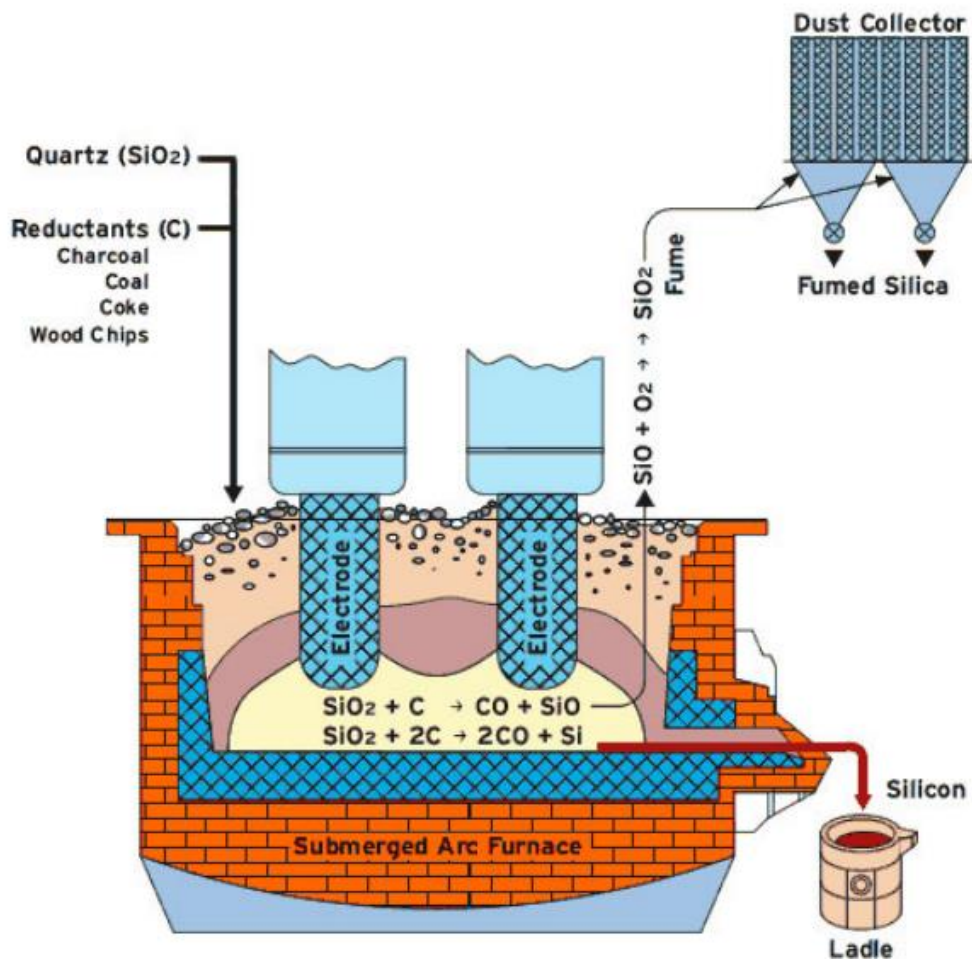
For the reasons described above, the Commissioner is satisfied that there is an Australian industry, being Simcoa, which continues to produce goods that are like to the goods under consideration. That is, goods that are although not alike in all respects to the goods under consideration, have characteristics closely resembling those of the goods under consideration.

2. Provide a summary and a diagram of your production process.

The production process can be described as follows:

- i). A mix of quartz, carbonaceous reducing agents (being charcoal, coal, petroleum coke) and wood chips are prepared and placed in a furnace;
- ii). A high electrical current is passed through electrodes within the furnace creating extreme heat;
- iii). The heat causes the raw materials to combine into a liquid silicon metal;
- iv). The liquid silicon metal is poured into a mould to cool and set;
- v). The solid silicon metal is broken down into lumps, granules or powder;
- vi). The silicon metal is packed for sale.

In diagrammatic representation:



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3. If your product is manufactured from both Australian and imported inputs:
 - describe the use of the imported inputs; and
 - identify that at least one substantial process of manufacture occurs in Australia (for example by reference to the value added, complexity of process, or investment in capital).

Silicon is manufactured from locally-produced inputs including quartz, charcoal, coal and char involving a high endothermic process that is considered substantial and highly capital intensive.

A-3 The Australian market

Products in the Australian market

1. Generally describe the range of the goods offered for sale in the Australian market. Your description could include information about:
 - quality differences
 - price differences
 - supply/availability differences
 - technical support differences
 - product segmentation.

The product in question is silicon metal of various grades, typically crushed to a 10-100mm lump product. Quality (both in production of meeting grades, crushing and packaging) is a focus, with packaging configurations ranging from 10kg boxes to 250kg, 500kg, 1,000kg and 1,250 kg bulk bags.

The technical documentation, namely Certificates of Analysis, is second to none with traceability provided back to the type of quartz used to produce the goods.

Simcoa's customers also value local technical support.

2. Describe the end uses of the goods in the Australian market from all sources.

Silicon metal is sold into primary aluminium and secondary aluminium end-uses.

Silicon metal used in primary aluminium applications is combined with other elements to produce foundry and extrusion alloys which are used in the manufacture of goods such as car and truck wheels, window frames and door frames. Silicon metal used in these applications requires higher purity levels.

Silicon metal used in secondary aluminium applications generally requires lower quality inputs and is used in the manufacture of die casting alloys used for automotive parts, including manifolds, crank cases and other engine components.

3. Describe the different sales channels you supply the goods (for example, retail, wholesale, direct installation etc.), and the types of customers in each sales channel.

Simcoa sells the goods directly to end users, not via distributors or retailers.

4. Describe the key product attributes that influence purchasing decisions or purchaser preferences in the Australian market. Rank these preferences or purchasing influences in order of importance.

The main decision to purchase is driven by quality of product and reliance in the technical grade of the product. Given silicon metal is an additive, it can be the difference between the alloy meeting requirements or failing end user qualification.

Pricing influences the purchasing decision given that the price for aluminium is typically set through the London Metal Exchange (LME), and additives are additional costs which influence end user margins.

Lastly, local supply chains also influence decisions especially given current international shipping challenges.

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5. Describe the process by which your customers select your goods and the key factors that informed that decision.

Many customers have been purchasing for lengthy periods from Simcoa. They know Simcoa represents a good quality product at a reasonable price.

6. What are the key differences between locally made goods and imported goods? How do these factors impact the purchasing decisions of your customers?

Quality control of the end product is paramount, along with being able to prove supply chains of materials. Simcoa also strictly abides by Environmental, Social, and Governance (ESG) factors (including modern slavery). The Chinese goods can be produced from Uyghur labour.

7. How easily can your customers change suppliers? Provide a description of factors that may cause a re-evaluation of your supply arrangements.

Customers can change to imported products relatively easy should significantly cheaper product be available.

8. Identify if there are any commercially significant market substitutes in the market for the goods in Australia.

There are no commercially significant substitutes to silicon metal produced by the Australian industry and the imported silicon metal.

9. Have there been any changes in market or consumer preferences for the goods in Australia in the last five years? Do you anticipate any change in preference in the coming five years? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response.

There have been no significant changes to the goods Simcoa manufacture in the last 5 years.

Prevailing conditions of competition in the Australian market

10. In respect of the Australian market for the goods and the prevailing conditions of competition within the market:

- (a) Provide an overall description of the market for the goods in Australia which explains its main characteristics and trends over the past five years.

The market has shrunk over the last decade as competition from China has increased. Domestic primary aluminium companies have faced threats from cheap Chinese and Middle Eastern products along with greener products from areas such as Canada. The secondary aluminium market has been in significant decline due to scrap metal being exported to China and the domestic market not being large enough to compete.

- (b) Provide the sources of demand for the goods in Australia, including the categories of customers, users or consumers of the product.

As noted above, silicon metal is sold to primary and secondary aluminium end-users. As a result, demand for silicon metal is largely dependent on the demand for aluminium products.

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- (c) Provide your estimate of the proportion (%) of the market that each of those sources of demand listed in (b) represents.

[XX] percent of Simcoa's domestic silicon metal sales goes into the aluminium market. This represents approx. [XX] percent of Simcoa's per annum sales.

- (d) Describe the factors that influence consumption/demand in Australia, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production.

Demand for aluminium products determines demand for silicon metal. Factors going into whether aluminium companies operate in Australia is determined by electricity availability and price, along with labour and technical know-how.

- (e) Describe any market segmentations in Australia; such as geographic or product segmentations.

Market segment is either primary or secondary production.

- (f) Provide your estimate of the proportion (%) of the market that each of the market segments listed in (e) represents.

Of Simcoa's domestic sales, greater than [XX]% goes into primary aluminium production.

- (g) Describe the way in which Australian manufactured and other imported goods compete in the Australian market.

Silicon metal produced by the Australian industry competes directly with and has the same end uses as silicon metal imported from China.

- (h) Describe the ways that the goods are marketed and distributed in the Australian market.

Silicon metal is purchased by aluminium producers and sourced either from imports or from Simcoa. Sales are made direct to end-users.

- (i) Describe any other factors that are relevant to characteristics or influences on the market for the goods in Australia.

Not Applicable.

11. Describe the commercially significant market participants in the market for the goods in Australia at each level of trade over the inquiry period. Include in your description:
- names of the participants;
 - the level of trade for each market participant (e.g., manufacturer, reseller, original equipment manufacturer (EOM), end-user etc.);
 - a description of the degree of integration (either vertical or horizontal) for each market participant; and
 - an estimate of the market share of each participant.

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Simcoa is the sole Australian producer of silicon metal. As such, all other relevant Australian market participants are the Australian importers and Australian end-user aluminium industry customers.

12. Identify the names of commercially significant importers in the market for the goods in Australia over the investigation period and estimate their market share. Specify the country each importer imports from and their level of trade in the Australian market, if known.

The main known importer is Rio Tinto, for use in its own production. Other than China, the other main exporting country would be Malaysia.

13. Describe any entry restrictions for new participants into the market for the goods in Australia. Your response could include information on:
- patents and copyrights;
 - licenses;
 - barriers to entry;
 - import restrictions; and
 - government regulations (including the effect of those government regulations).
- In responding to this question ensure that relevant regulations are referenced.*

Barriers to entry into the market include (but are not limited to):

- ability to secure power contracts;
 - ability to source raw materials (quartz and carbon);
 - environmental and government approvals;
 - significant capital investment in plant;
 - knowledge and ability to operate silicon furnaces, given their highly specialised nature; and
 - availability of significant working capital to support the initial startup phase.
14. Do you anticipate any changes in patterns of supply and demand in the Australian market over the next 1 to 5 years? What are your expectations for your own sales/purchases of the goods over that period? Provide any relevant commentary to support your answers.

The *Resources and Energy Quarterly, March 2024* report from the Department of Industry, Science and Resources² provides the following outlook for Australia's aluminium, alumina, and bauxite production, consumption and exports, highlighting forward-view stability:

² Refer [Resources and Energy Quarterly March 2024 \(industry.gov.au\)](https://www.industry.gov.au)

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Australia	Unit	2022–23	2023–24 ^f	2024–25 ^f	2025–26 ^e	2026–27 ^e	2027–28 ^e	2028–29 ^e	CAGR ^g
Production									
Primary aluminium	kt	1,532	1,571	1,561	1,561	1,561	1,561	1,561	0.3
Alumina	kt	18,971	19,445	18,484	18,564	18,564	18,564	18,564	-0.4
Bauxite	Mt	98.5	107.8	106.4	106.4	122.4	122.4	122.4	3.7
Consumption									
Primary aluminium	kt	151	150	126	126	126	126	126	-3.0
Exports									
Primary aluminium	kt	1,440	1,462	1,483	1,483	1,483	1,483	1,483	0.5
- nominal value	A\$m	5,281	4,985	5,108	5,129	5,168	5,248	5,309	0.1
- real value ^e	A\$m	5,494	4,985	4,951	4,837	4,756	4,711	4,650	-2.7
Alumina	kt	16,566	17,165	16,636	16,708	16,708	16,708	16,708	0.1
- nominal value	A\$m	8,308	8,826	8,370	8,023	7,977	8,064	8,215	-0.2
- real value ^e	A\$m	8,642	8,826	8,112	7,567	7,340	7,239	7,195	-3.0
Bauxite	kt	34,113	43,237	43,492	43,492	50,212	50,212	50,212	6.7
- nominal value	A\$m	1,284	1,987	1,987	2,023	2,517	2,517	2,517	11.9
- real value ^e	A\$m	1,335	1,987	1,926	1,908	2,316	2,260	2,205	8.7
Total value									
- nominal value	A\$m	16,005	16,967	17,535	18,061	18,511	18,678	18,890	2.8
- real value ^e	A\$m	16,649	16,967	16,996	17,035	17,033	16,768	16,544	-0.1

Table 1: Australia's aluminium, alumina and bauxite outlook

Simcoa's expectations are that current primary production by Rio Tinto will be challenging but remain flat. [**Confidential text deleted: commercially sensitive market-related comments**].

Relationship between price and cost in Australia

15. Is your organisation/business entity the price leader of the goods in the Australian market? If no, please explain the reasons behind your response and specify the name(s) of the price leaders.

At present, Simcoa is [**confidential text deleted: Simcoa's supply position in the Australian market**].

16. Describe the nature of your pricing for the goods (e.g. market penetration, inventory clearance, product positioning, price taker, price maker, etc.) and your price strategies (e.g., competition-based pricing, cost-plus pricing, dynamic pricing, price skimming, value pricing, penetration pricing, bundle pricing, etc.) in Australia. If there are multiple strategies applied, please rank these by importance. If there are different strategies for different products, please specify these. Provide copies of internal documents which support the nature of your product pricing.

Simcoa's marketing strategies aim to consider a number of silicon indices globally, alongside supply and demand factors. [**Confidential text deleted: specific Simcoa pricing metrics**].

17. How frequently are your Australian selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review.

Selling prices are reviewed either at time of completing negotiations (spot sales) or monthly under the umbrella of an annual contract.

18. Rank the following factors in terms of their influence on your pricing decisions in the Australian market, with the most important factor ranked first and the least important factor ranked last:

Against each of the below, a ranking has been noted:

- Competitors' prices ([XX])
- Purchase price of raw materials ([XX])
- Cost to make and sell the goods ([XX])

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- Level of inventory ([XX])
- Value of the order ([XX])
- Volume of the order ([XX])
- Value of forward orders ([XX])
- Volume of forward orders ([XX])
- Customer relationship management ([XX])
- Supplier relationship management ([XX])
- Desired profit ([XX])
- Brand attributes ([XX])
- Other [please define what this factor is in your response].

A-4 Company sales

1. Please **update** appendix A4.1 (sales).
 - if any of the customers listed at appendix A4.1 (sales) are associated with your business, provide details of the association. Describe the price effect of the association. For example, is there preferential pricing for related parties?

Not applicable. Simco does not make sales of the goods to any associated/related parties.

2. Please identify in appendix A4.1 (sales) any transactions that are:
 - internal transfers; or
 - sales of like goods that you have not produced, for example if you have imported the product or on-sold purchases from another Australian manufacturer or importer.

Not applicable, as neither internal transfers or on-sales of imported goods are made by Simcoa.

3. Attach a copy of distributor or agency agreements/contracts.

Not applicable, as Simco makes sales of the goods directly to end-users.

4. Provide copies of any price lists.

Simcoa doesn't [**confidential text deleted: pricing details**].

Please complete appendix A4.4 contracts and tenders. Please provide two contracts that had the highest monetary value.

Not applicable, as Simcoa does not provide the goods on a contract/tenders basis.

5. If any price reductions (for example commissions, discounts, rebates, allowances and credit notes) have been made on your Australian sales of like goods provide a description and explain the terms and conditions that must be met by the customer to qualify.
 - where the reduction is not identified on the sales invoice, explain how you calculated the amounts shown in appendix A4.1 (sales).
 - if you have issued credit notes (directly or indirectly) provide details if the credited amount has **not** been reported appendix A4.1 (sales) as a discount or rebate.

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Discounts are offered to Australian customers. Prices are negotiated at time of request from customers taking into account market and price index conditions at the time. The actual price negotiated is as per the customer invoice.

6. Select the two highest domestic sales invoices from the data supplied in appendix A4.1 (sales). Provide a complete set of commercial documentation for these sales. Include purchase order, order acceptance, commercial invoice, discounts or rebates applicable, credit/debit notes, long or short term contract of sale, inland freight contract, and bank documentation showing proof of payment.

Refer Confidential Attachment A-4.6.

Projects and additional services

7. Do you offer additional services alongside sales of the goods (for example, assembly or installation services)? If yes, provide details about:
 - (a) The different types of services offered
 - (b) What activities are involved in the delivery of each service
 - (c) The percentage of domestic sales where associated sales are provided
 - (d) The factors that influence the price of each associated service

Not applicable.

8. Do you offer to supply the goods as a part of tenders for larger projects (for example, development or installation of a new warehousing solution, or integration with an existing solution)? If yes, please complete the worksheet named "A-4.1 Projects and tenders", which details information about any tender bids and completed projects that include the sale of the goods.

Not applicable.

9. For each of the 2 largest successful tender bids (by value) in "A-4.1 Projects and tenders", provide relevant documents including the request for tender, and your winning bid.

Not applicable.

A-5 General accounting/administration information

1. Specify your accounting period.

Simcoa's financial year is 1 January to 31 December.

2. Provide details of the address(es) where your financial and production records are held.

Simcoa's financial records are held at 973 Marriott Road, Wellesley, W.A. 6233.

3. Please provide the following financial documents for the two most recently completed financial years plus any subsequent statements:
 - chart of accounts;
 - audited consolidated and unconsolidated financial statements (including all footnotes and the auditor's opinion);
 - internal financial statements, income statements (profit and loss reports), or

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management accounts, that are prepared and maintained in the normal course of business for the goods.

These documents should relate to:

- a. the division or section/s of your business responsible for the production and sale of the goods covered by the investigation, and
- b. the company overall.

For Simcoa's chart of accounts, refer Confidential Attachment A-5.3.1. For Simcoa's audited accounts, refer Confidential Attachments A-1.9.1 and 1.9.2. For Simcoa's internal financial statements, refer Confidential Attachment A-5.3.2.

4. If your accounts are **not** audited, provide the unaudited financial statements for the two most recently completed financial years, together with your taxation returns. Any subsequent monthly, quarterly or half yearly statements should also be provided.

Not applicable.

5. Describe your accounting methodology, where applicable, for:
 - the recognition/timing of income, and the impact of discounts, rebates, sales returns warranty claims and intercompany transfers

Revenue from the sale of goods is recognized when the company has transferred to the buyer the significant risks and rewards of ownership of the goods.

- provisions for bad or doubtful debts

A provision for doubtful debts is raised when some doubt as to collection is identified.

- the accounting treatment of general expenses and/or interest and the extent to which these are allocated to the cost of goods

General expenses and interest are allocated across production tonnes.

- costing methods – standard or actual costs (e.g. by tonnes, units, revenue, activity, direct costs etc) and allocation of costs shared with other goods or processes

Costs are identified on a production per tonne basis – actual costs incurred. Costs include materials, labour, and allocated variable and fixed overheads, on an absorption cost basis.

- the method of valuation for inventories of raw material, work-in-process, and finished goods (e.g. FIFO, weighted average cost)

Finished goods, raw materials, spares and consumable stocks are valued at the lower of cost and net realizable value.

- valuation methods for scrap, by-products, or joint products

The lower of cost and net realisable value.

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- valuation methods for damaged or sub-standard goods generated at the various stages of production

Not applicable.

- valuation and revaluation of fixed assets

Following initial recognition, assets are valued at fair value.

- average useful life for each class of production equipment, the depreciation method and depreciation rate used for each

Depreciation is calculated on a straight-line basis so as to write off the net cost or other revalued amount of each asset over its expected useful life to its estimated residual value. The estimated useful lives, residual value and depreciation method are reviewed at the end of each annual reporting period.

The following estimated useful lives are used in the calculation of depreciation:

- Buildings 16-20 years; and
 - Plant and equipment 5-20 year
- treatment of foreign exchange gains and losses arising from transactions and from the translation of balance sheet items

Foreign exchange gains and losses are recognized in the profit and loss period in which they arise.

- restructuring costs, costs of plant closure, expenses for idle equipment and/or plant shut-downs.

Restructuring costs, costs of plant closure, expenses for plant closures are brought to account in the reporting period in which they are incurred.

6. If the accounting methods used by your company have changed over the period covered by the inquiry please provide an explanation of the changes, the date of change, and the reasons.

The accounting methods have not altered over the periods for which financial data has been prepared for this application.

A-6 Cost information

1. Complete appendices A6.1 and A6.2 (cost to make) for domestic and export sales.

As provided with Simcoa's application for measures continuation.

2. Please complete appendix A6.3 (SG&A list) for domestic selling general and administration expenses.

Refer completed industry questionnaire spreadsheets.

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A-7 Other Factors, Upwards sales and costs reconciliation

1. Complete appendix A7 (other factors).

The appendix file was provided at application.

1. Please complete the reconciliation templates for appendix A7.1 upwards sales.

As provided as part of this questionnaire response.

2. Please complete the reconciliation templates for appendix A7.2 upwards costs.

As provided as part of this questionnaire response.

A-8 Injury Claims

1. Please provide any additional information (not already provided in your application) or elaborate on your application claims, addressing the likelihood of material injury occurring to the Australian industry in the absence of the anti-dumping measures.

In addition to the evidence presented in Simcoa's continuation application, refer Confidential Attachments A-8(1) and (2). These comprise Chinese pricing offers which substantially undersell Australian industry pricing. Made within the parameters of the of the existing measures, these prices would be even lower and even further materially injurious in the absence of such.

2. Discuss factors other than dumped imports that may have caused injury to the industry. This may be relevant to the inquiry in that an industry weakened by other events may be more susceptible to injury from dumping.

Other general economic factors that may be assessed as relevant include:

- Australian power policy which discourages industry in heavy electricity usage areas;
- Environmental policies which restrain investment in raw materials and mine sites;
- Unreliable shipping and length of supply chains to European and U.S. markets; and
- The critical mineral listing has been positive, however there has been little support for silicon metal on the critical mineral list.³

3. What impact did the Covid-19 pandemic have or be likely to have on the economic condition of the Australian industry?

Covid led to shortages of quality product around the world. At the same time, China and Australian trade relations deteriorated. Due to shortages in silicon metal, demand improved and led to price increases during the period after the initial Covid outbreaks.

Responses should be made as accurately and as comprehensively as possible. Supporting evidence should be attached wherever possible. It will not be sufficient to simply assert that the measure should remain in force.

³ Refer Non-Confidential Attachment A-8.2: *Australia's trade and investment opportunities in a global green economy; Joint Standing Committee on Trade and Investment Growth, October 2023* (Canberra). The Australian list of critical minerals begins at p. 195 of the document. Silicon is listed as number 21 (p. 196).