



Public File

Application for the publication of
dumping and/or
countervailing duty notices

Ammonium Nitrate

Exported from

The People's Republic of China,
Sweden and Thailand

March 2018

APPLICATION UNDER SECTION 269TB OF THE *CUSTOMS ACT 1901* FOR THE PUBLICATION OF DUMPING AND/OR COUNTERVAILING DUTY NOTICES

DECLARATION

I request, in accordance with section 269TB of the *Customs Act 1901* (the Act), that the Minister publish in respect of goods the subject of this application:


- a dumping duty notice, or
- a countervailing duty notice, or
- a dumping and a countervailing duty notice


This application is made on behalf of the Australian industry producing like goods to the imported goods the subject of this application. The application is supported by Australian producers whose collective output comprises:


- 25% or more of the total Australian production of the like goods; and
- more than 50% of the total production of like goods by those Australian producers that have expressed either support for, or opposition to, this application.

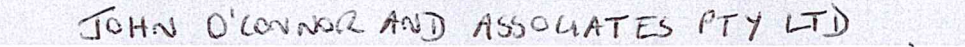
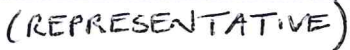
I believe that the information contained in this application:

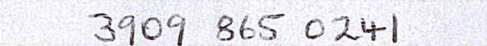
- provides reasonable grounds for the publication of the notice(s) requested; and
- is complete and correct.

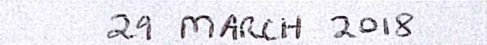
Signature: 

Name: 

Position: 

Company: 


ABN: 

Date: 

IMPORTANT INFORMATION

Signature requirements

Where the application is made:

By a company - the application must be signed by a director, servant or agent acting with the authority of the body corporate.

By a joint venture - a director, employee, agent of each joint venturer must sign the application. Where a joint venturer is not a company, the principal of that joint venturer must sign the application form.

On behalf of a trust - a trustee of the trust must sign the application.

By a sole trader - the sole trader must sign the application.

In any other case - contact the Commission's Client support section for advice.

Assistance with the application

The Anti-Dumping Commission has published guidelines to assist applicants with the completion of this application. Please refer to the following guidelines for additional information on completing this application:

- *Instructions and Guidelines for applicants: Application for the publication of dumping and or countervailing duty notices*
- *Instructions and Guidelines for applicants: Examination of a formally lodged application*

The Commission's client support section can provide information about dumping and countervailing procedures and the information required by the application form. Contact the team on:

Phone: 13 28 46

Fax: (03) 8539 2499

Email: clientsupport@adcommission.gov.au

Other information is available from the Commission's website at www.adcommission.gov.au.

Small and medium enterprises (i.e., those with less than 200 full-time staff, which are independently operated and which are not a related body corporate for the purposes of the *Corporations Act 2001*), may obtain assistance, at no charge, from the Department of Industry, Innovation and Science's International Trade Remedies Advisory (ITRA) Service. For more information on the ITRA Service, visit www.business.gov.au or telephone the ITRA Service Hotline on +61 2 6213 7267.

Important information

To initiate an investigation into dumping and/or subsidisation, the Commission must comply with Australia's international obligations and statutory standards. This form provides an applicant industry with a framework to present its case and will be used by the Commission to establish whether there are reasonable grounds to initiate an investigation. To assist consideration of the application it is therefore important that:

- all relevant questions (particularly in Parts A and B) are answered; and
- information that is reasonably available be supplied.

The Commission does not require conclusive evidence to initiate an investigation, but any claims made should be reasonably based. An application will be improved by including supporting evidence and where the sources of evidence are identified. Simple assertion is inadequate to substantiate an application.

To facilitate compilation and analysis, the application form is structured in 3 parts:

1. **Part A** seeks information about the Australian industry. This data is used to assess claims of material injury due to dumping/subsidisation. Where an Australian industry comprises more than one company, each should separately prepare a response to Part A to protect commercial confidentiality.
2. **Part B** relates to evidence of dumping.
3. **Part C** is for supplementary information that may not be appropriate to all applications. However some questions in Part C may be essential for an application, for example, if action is sought against subsidisation.

All questions in Parts A and B must be answered, even if the answer is 'Not applicable' or 'None'. Where appropriate, applicants should provide a short explanation about why the requested data is not applicable. This will avoid the need for follow up questions by the Commission.

The application form requests data over several periods (P^1, P^2, \dots, P^n) to evaluate industry trends and to correlate injury with dumped imports. The labels $P^1 \dots P^n$ are used for convenience in this application form. Lodged applications should identify the period relevant to the data. This form does not specify a minimum period for data provision. However, sufficient data must be provided to substantiate the claims made. If yearly data is provided, this would typically comprise a period of at least four years (for example the current financial year in addition to three prior years). Where information is supplied for a shorter period, applicants may consider the use of quarterly data. Data must also be sufficiently recent to demonstrate that the claims made are current.

When an investigation is initiated, the Commission will verify the claims made in the application. A verification visit to the Australian industry usually takes several days.

Applicant companies should be prepared to substantiate all Australian industry financial and commercial information submitted in the application. Any worksheets used in preparing the application should therefore be retained to facilitate verification.

During the verification visit, the Commission will examine company records and obtain copies of documents relating to the manufacture and sale of the goods.

Appendices

Some questions require attachments to be provided. The attachment numbering sequence should refer to the question answered. For example, question A2.2 requests a copy of an organisation chart. To facilitate reference, the chart should be labelled Attachment A2.2. If a second organisation chart is provided in

Provision of data	<p>response to the same question, it should be labelled <u>Attachment A2.2.2</u> (the first would be labelled <u>Attachment A2.2.1</u>).</p> <p>Industry financial data must, wherever possible, be submitted in an electronic format.</p> <ul style="list-style-type: none">• The data should be submitted on a media format compatible with Microsoft Windows.• Microsoft Excel, or an Excel compatible format, is required.• If the data cannot be presented electronically please contact the Commission's client support section for advice.
Lodgement of the application	<p>This application, together with the supporting evidence, must be lodged in the manner approved by the Commissioner under subsection 269SMS(2) of the Act. The Commissioner has approved lodgement of this application by either:</p> <ul style="list-style-type: none">• preferably, email, using the email address clientsupport@adcommission.gov.au, or• post to: The Commissioner of the Anti-Dumping Commission GPO Box 2013 Canberra ACT 2601, or• facsimile, using the number (03) 8539 2499.
Public Record	<p>During an investigation all interested parties are given the opportunity to defend their interests, by making a submission. The Commission maintains a public record of these submissions. The public record is available on the Commission's website at www.adcommission.gov.au.</p> <p>At the time of making the application both a confidential version (for official use only) and non-confidential version (public record) of the application <u>must</u> be submitted. Please ensure each page of the application is clearly marked "FOR OFFICIAL USE ONLY" or "PUBLIC RECORD". The non-confidential application should enable a reasonable understanding of the substance of the information submitted in confidence, clearly showing the reasons for seeking the conduct of a dumping and/or subsidy investigation, or, if those reasons cannot be summarised, a statement of reasons why summarisation is not possible. If you cannot provide a non-confidential version, contact the Commission's client support section for advice.</p>

PART A

INJURY

TO AN AUSTRALIAN INDUSTRY

IMPORTANT

All questions in Part A should be answered even if the answer is 'Not applicable' or 'None'. If an Australian industry comprises more than one company/entity, each should separately complete Part A.

For advice about completing this part please contact the Commission's client support section on:

Phone: 13 28 46
Fax: (03) 8539 2499
Email: clientsupport@adcommission.gov.au

A-1 Identity and communication.

Please nominate a person in your company for contact about the application:

This application for anti-dumping measures on ammonium nitrate ("AN") exported from the People's Republic of China ("China"), Sweden and Thailand is made on behalf of the Australian industry manufacturing AN (hereafter referred to as "the goods", or "like goods").

The relevant contacts within the applicant companies are as follows:

(i) Orica Australia Pty Ltd

Contact Name: Mr Malcolm Hart
Company and position: Senior AN Product Manager – API. Orica Australia Pty Ltd
Address: 1 Nicholson Street, Melbourne Victoria 3002
Telephone: +61 3 9665 7309
Facsimile:
E-mail address: malcolm.hart@orica.com
ABN: 99 004 117 828

(ii) CSBP Limited

Contact Name: Mr Gerard Chan
Company and position: Commercial Manager – Ammonium Nitrate, CSBP Limited
Address: Kwinana Beach Road, Kwinana W.A. 6966
Telephone: +61 8 9411 8593
Facsimile: +61 8 9312 9767
E-mail address: Gerard.chan@csbp.com.au
ABN: 81 008 668 371

(iii) QNP Limited

Contact Name: Mr Dave Armstrong
Company and position: General Manager, Queensland Nitrates Management Pty Ltd
Address: Three Chain Road, Moura QLD 4718
Telephone: +61 7 4997 5100
Facsimile: +61 7 4997 1407
E-mail address: DArmstrong@qnp.com.au
ABN: 92 081 555 455

If you have appointed a representative to assist with your application, provide the following details and complete Appendix A8 (Representation).

The ammonium nitrate ("AN") industry has engaged the services of the following representative:

Name: Mr John O'Connor
Business name: John O'Connor and Associates Pty Ltd
Address: P.O. Box 329, Coorparoo, QLD 4151
Telephone: (07) 3342 1921
Facsimile: (07) 3342 1931
E-mail address: jmoconnor@optusnet.com.au
ABN: 3909 865 0241

A-2 Company information.

- 1. State the legal name of your business and its type (eg. company, partnership, sole trader, joint venture). Please provide details of any other business names you use to manufacture/produce/sell the goods that are the subject of your application.**

This application is made by the Australian industry manufacturing ammonium nitrate ("AN") comprising:

- Orica Australia Pty Ltd;
- CSBP Limited and
- Queensland Nitrates Pty Limited.

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

Orica Australia Pty Ltd ("Orica") has included a copy of its internal organisation chart at Orica Confidential Attachment A-2.2. CSBP Limited's organisation chart is at CSBP Confidential Attachment A-2.2. The QNP organisation chart is included at QNP Confidential Attachment A-2.2.

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

Orica Australia Pty Ltd is a subsidiary of the publicly listed Orica Limited. CSBP Limited ("CSBP") is a subsidiary of the publicly listed Wesfarmers Limited. Queensland Nitrates Pty Ltd ("QNP") is a joint venture between CSBP and Dyno-Nobel Ltd (a wholly-owned subsidiary of Incitec-Pivot).

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

Please refer to response at A-2.3 above.

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

Please refer to A-2.3 above.

- 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).**

Please refer to:

- Orica Confidential Attachment A-2.6;
- CSBP Confidential Attachment A-2.6; and
- QNP Confidential Attachment A-2.6.

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

For CSBP and QNP there are no corporate allocations. For Orica, the allocations for selling and administration costs relate to the regional business (i.e. Australian mining business) only.

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

The applicant companies do not have a relationship (commercial or otherwise) with an exporter to Australia or Australian importer of the goods the subject of this application.

9. **Provide a copy of all annual reports applicable to the data supplied in appendix A3 (Sales Turnover). Any relevant brochures or pamphlets on your business activities should also be supplied.**

Please refer to:

- Orica Non-Confidential Attachment A-2.9;
- CSBP Non-Confidential Attachment A-2.9; and
- QNP Confidential Attachment A-2.9.

10. **Provide details of any relevant industry association.**

Orica Australia is a member of the following industry associations:

- Chemistry Australia;
- Australian Explosives Industry Safety Group (AEISG);
- Minerals Council of Australia;
- Australian Industry Group (AiGroup);
- Business Council of Australia.

CSBP Limited is a member of the following industry associations:

- Chemistry Australia;
- Western Australia Chamber of Commerce and Industry;

QNP is a not a member of any industry association.

A-3 The imported and locally produced goods.

1. Fully describe the imported product(s) the subject of your application:

- **Include physical, technical or other properties.**
- **Where the application covers a range of products, list this information for each make and model in the range.**
- **Supply technical documentation where appropriate.**

Goods description

The good the subject of this application is:

Ammonium nitrate, prilled, granular or in other solid form, with or without additives or coatings, in packages exceeding 10kg.

In an earlier investigation involving ammonium nitrate exported from Russia, the issue of like goods was discussed. In Report No. 28, the Australian Customs and Border Protection Service ("ACBPS") determined that:

Low density, high density ammonium nitrate and ammonium nitrate solution are subsets of the product group ammonium nitrate....all types of ammonium nitrate, irrespective of whether in solid or solution state, prilled or granular form, low density or high density, are like goods.

The ACBPS also found that "although LDAN, HDAN and ammonium nitrate solution (ANSol) were not identical to the goods, they possessed physical characteristics closely resembling them. It was also determined that:

- Australian produced LDAN was substitutable with imported LDAN;
- Australian produced HDAN and ANsol could be substitutable with imported high density HDAN;
- In certain circumstances, high and low density ammonium nitrate could be substituted for each other; and
- Emulsion explosives made from both ANsol and HDAN compete with each other."

The applicants submit that the findings in Report No. 28 and re-affirmed in Reports No 104 and 105, Reports No 168 and 169, and Report No. 312, continue as at the date of this application concerning what constitutes like goods to ammonium nitrate.

2. What is the tariff classification and statistical code of the imported goods.

Ammonium nitrate, whether or not in aqueous solution, is classified within subheading 3102.30.00 statistical code 05 in Schedule 3 to the Customs Tariff Act 1995.

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

- **Include physical, technical or other properties.**
- **Where the application covers a range of products, 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.**

The products manufactured by the Australian industry includes low density ammonium nitrate ("LDAN"), high density ammonium nitrate ("HDAN"), and ANsol are considered to be like goods to imported LDAN and HDAN from China, Sweden and Thailand. Refer Orica Confidential Attachment A-3.3. for Product specification sheets.

4. Describe the ways in which the essential characteristics of the imported goods are alike to the goods produced by the Australian industry.

The Applicants' consider that the imported AN possess similar characteristics to the AN manufactured in Australia. The Applicants' consider that the essential characteristics of the imported goods and the locally produced goods are alike for the following reasons:

- Physical likeness – the goods produced by the Chinese, Swedish and Thai exporters are similar in physical appearance and specification;
- Commercial likeness – the imported goods compete directly with the locally produced goods and are interchangeable in end-use applications. The selling prices for the imported AN and the locally produced AN are similar, albeit that the former is priced at levels below the selling prices for locally produced AN;
- Functional likeness – the imported goods and the locally produced goods perform the same function and are used in the same end-use application;
- Production likeness – the imported and locally produced AN are manufactured via similar production processes.

5. What is the Australian and New Zealand Standard Industrial Classification Code (ANZSIC) applicable to your product.

The ANZSIC applicable to the goods the subject of this application is Sub-Division 18, Class 1892 Explosive Manufacturing.

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

Ammonium nitrate ("AN") is produced by neutralising nitric acid with ammonia (NH₃). Ammonia is produced from natural gas, which typically accounts for approximately 50 per cent of the production cost of AN. Natural gas is reacted with steam, and air to produce hydrogen, nitrogen and carbon dioxide. The carbon dioxide is removed and the hydrogen is reacted with nitrogen to produce ammonia.

Nitric acid is produced through the reaction of ammonia with oxygen in the presence of a catalyst. The reaction produces nitric oxides, which are dissolved in water to produce nitric acid. The reaction of ammonia with nitric acid produces an ammonium nitrate solution (ANsol). This may be sold in the solution state or solidified by prilling or granulation.

In order to manufacture prills, the solution is sprayed into the top of a prilling tower, a rising air stream cools and solidifies the falling droplets into spherical balls or prills.

The density of the finished product is governed by the concentration of the solution. Low density AN prills are produced using a solution with a higher moisture content. The solidified prills also have a high moisture content and go through a lengthy drying process. High density prills are manufactured using a solution with a lower moisture content.

To produce a low density product, additives are introduced prior to prilling which changes the structure of the prills during the prilling process to make it form a hollow, honeycomb type structure. It is the additives that increase the internal crystalline strength of the low density product. Coating agents are applied to stop the product clumping together, and to improve handling and storage properties.

Granules are made either by a rotating drum granulation process or fluid bed granulation process. Regardless of the production process, all granules are high density.

7. **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).**

AN is manufactured predominantly from locally manufactured raw materials (most notably, natural gas). The natural gas is used in the manufacture of ammonia. The ammonia is then reacted with oxygen and a catalyst (the catalyst is imported). The manufacture of chemicals at each stage in the AN manufacturing process are considered substantial processes of manufacture (i.e. the production of ammonia, nitric acid and ammonium nitrate) involving substantial value-adding processes that involve capital-intensive production facilities.

AN is therefore considered a substantially transformed good manufactured via a value-add process that involves locally sourced raw materials (i.e. natural gas).

8. **If your product is a processed agricultural good, you may need to complete Part C-3 (close processed agricultural goods).**

The goods the subject of this application is not a close processed agricultural good.

9. **Supply a list of the names and contact details of all other Australian producers of the product.**

The other remaining manufacturer of AN in Australia is:

Incitec Pivot Pty Ltd
Level 8
28 Freshwater Place
Southbank Victoria 3006
Tel: +61 3 8695 4400
Fax: +61 3 8695 4419

Dyno Nobel Asia Pacific Pty Ltd is a wholly owned subsidiary of Incitec Pivot. Dyno Nobel supplies locally manufactured and imported AN into the Australian market. Dyno Nobel's contact details are as follows:

Dyno Nobel Asia Pacific Pty Ltd
282 Paringa Road
Murarrie Queensland 4172
Tel: +61 7 3026 3900

Yara Pilbara is in the process of commencing production of AN in Australia in the north-west of Australia. The company is building a joint-venture facility with Orica Limited, and operates as Yara Pilbara Fertilisers Pty Ltd.

Contact details are:

Yara Pilbara
Lot 564 Village Road
Burrup Peninsula, W.A. 6714
Tel: +61 8 9183 4100
Fax: +61 8 9185 6776

A-4 The Australian market.

1. Describe the end uses of both your product and the imported goods.

The Australian market for AN is supplied predominantly from locally produced goods and imports that is primarily used as a raw material in the manufacture of explosives predominantly used by the mining, quarrying and construction industries.

AN is also used as a fertiliser in agricultural applications, although the market for this application in Australia is relatively small. This is due to the handling protocols required for the transport of AN relative to other nitrogenous products such as urea and urea ammonium nitrate.

The local manufacture of AN is by the following companies:

- Orica Australia;
- CSBP Limited;
- QNP; and
- IncitecPivot Limited.

Yara Pilbara is a new entrant in the AN production market in Australia. The company's production facility is expected to commence manufacture of AN later in 2018.

2. Generally describe the Australian market for the Australian and imported product and the conditions of competition within the overall market. Your description could include information about:

- **sources of product demand;**
- **marketing and distribution arrangements;**
- **typical customers/users/consumers of the product;**
- **the presence of market segmentation, such as geographic or product segmentation;**
- **causes of demand variability, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production;**
- **the way in which the imported and Australian product compete; and**
- **any other factors influencing the market.**

Demand for AN in Australia is driven by mining companies seeking to extract beneficial ores (i.e. iron and coal) from the earth. AN production facilities are located close to the main mining areas of the Hunter Valley, in NSW, the Bowen basin in Queensland, the Kalgoorlie region of western Australia and, more recently, the Pilbara region in Western Australia.

AN is supplied to mines (whether to mining principals or via mining services contractors) through long-term and spot contracts.

The Applicants hold some supply contracts with customers, with the remaining AN sold on a spot supply basis. Most contracts operate for a five to three-year period; other contracts for shorter periods. The contracts (typically arranged following a tender process) will normally specify a base price, with adjustment clauses (typically for movements in raw material gas or ammonia prices), and certain other conditions of sale.

In some instances, long term contracts underpin the business case for the production and maintaining of AN production facilities. However, as identified in Report No. 312 by the Commission, the contracts do not guarantee exclusive supply for the Australian manufacturer. The tender process and the opportunity for dual supply by mine operators, exposes the Australian industry to import competition from imports that are sourced from the Russian Federation, the Ukraine, China, Indonesia, Sweden, Uzbekistan, Thailand and Chile. Customers therefore may source a portion of their AN requirements from suppliers located offshore.

In Report No. 312, the Commission confirmed that the Australian industry almost exclusively manufactures LDAN and ANsol. The production of HDAN is somewhat incidental to the production of LDAN.

3. Identify if there are any commercially significant market substitutes for the Australian and imported product.

There exist no commercially significant substitutes for AN in Australia, other than variants of AN that may include differing purity of AN. In these instances, AN that has an additive incorporated continues to be used in the same end-use applications and is considered alike to goods produced in Australia.

4. Complete appendix A1 (Australian production). This data is used to support your declaration at the beginning of this application.

Confidential Appendix A1 detailing production volumes in 2017 has been completed on behalf of the Australian industry. Please refer to Industry Confidential Appendix A1.

5. Complete appendix A2 (Australian market).

Confidential Appendix A2 – Australian Market for AN has been completed on behalf of the applicant companies. Please refer to Industry Confidential Appendix A2.

6. Use the data from appendix A2 (Australian market) to complete this table:

Indexed table of sales quantities

Period	(a) Your Sales	(b) Other Aust ⁿ Sales	(c) Total Aust ⁿ Sales (a+b)	(d) Dumped Imports	(e) Other Imports	(f) Total Imports (d+e)	Total Market (c+f)
2014	100	100	100	100	100	100	100
2015	106.3	100	105.4	25.6	70.9	54.2	99.8
2016	110.8	130.8	113.7	39.8	73.7	61.2	107.9
2017	108.2	130.8	111.4	66.8	40.5	50.2	104.7

Source: Industry Confidential Attachment A2.

Notes:

1. IncitecPivot commenced AN production at Mooranbah in 2012.

The Australian market for AN has increased by almost five percent between 2014 and 2016, and then has contracted in 2017.

Anti-Dumping measures already apply to AN exported from the Russian Federation. Total import volumes from the Russian Federation are not insignificant – at approximately 16 per cent of total import volume in 2017. The dumped imports account for approximately 49 per cent of total import volumes in 2017, having displaced imports from other source countries.

The trend in the import volumes from China, Sweden and Thailand over the four-year injury period 2014 to 2017 reflects the relative pricing of AN from the subject countries. In 2014, China was the lowest price source country for AN; volumes shifted away from China to Sweden in the next two years, and commenced from Thailand in late 2016 to early 2017. Following the further scaling back of some production capacity by Orica Australia at its Yarwun AN production facility (to approx. xxx,xxx tonnes), Orica Australia sourced some requirements to supplement local production from its related-party facility in Indonesia.

The dumped imports have increased in volumes from 2015 to 2017 to account for almost 50 per cent of total imports in 2017. The growth in the dumped import volumes has only been possible due to the low export prices at dumped levels.

A-5 Applicant's sales.**1. Complete appendix A3 (sales turnover).**

Confidential Appendix A3 has been completed for this application.

2. Use the data from appendix A3 (sales turnover) to complete these tables.

Each of the applicant companies has completed its own Confidential Appendix A3.

*Indexed table of CSBP's sales quantities**

Quantity	2014	2015	2016	2017
All Products				
Aust. Market	100	104.0	111.1	103.8
Export Market	100	516.2	173.4	-
Total	100	104.6	111.2	103.6
Like Goods				
Aust. Market	100	121.6	137.0	129.3
Export Market	100	516.2	173.4	-
Total	100	123.5	137.1	128.7

*Indexed table of CSBP's sales values**

Revenues	2014	2015	2016	2017
All Products				
Aust. Market	100	108.5	107.1	97.6
Export Market	100	545.5	202.9	-
Total	100	108.9	107.2	97.5
Like Goods				
Aust. Market	100	128.9	137.4	128.1
Export Market	100	545.5	202.9	-
Total	100	130.4	137.6	127.6

CSBP has experienced a decline in sales volumes and values of like goods in 2017.

*Indexed table of Orica's sales quantities**

Quantity	2014	2015	2016	2017
All Products				
Aust. Market	100	-	-	-
Export Market	100	-	-	-
Total	100	-	-	-
Like Goods				
Aust. Market	100	88.6	85.2	86.0
Export Market	100	38.3	43.2	18.0
Total	100	87.0	83.9	83.9

*Indexed table of Orica's sales values**

Revenues	2014	2015	2016	2017
All Products				
Aust. Market	100	84.2	75.7	79.2
Export Market	100	50.8	44.8	20.8
Total	100	82.9	74.5	77.1
Like Goods				
Aust. Market	100	83.1	75.8	76.4
Export Market	100	49.8	51.6	22.3
Total	100	82.4	75.3	75.2

Orica's sales volumes and revenues of like goods have remained flat in 2016 and 2017.

*Indexed table of QNP's sales quantities**

Quantity	2014	2015	2016	2017
All Products				
Aust. Market	100	91.1	101.1	92.2
Export Market	100	-	-	-
Total	100	91.1	101.1	92.2
Like Goods				
Aust. Market	100	91.1	101.1	92.2
Export Market	100	-	-	-
Total	100	91.1	101.1	92.2

*Indexed table of QNP's sales values**

Revenues	2014	2015	2016	2017
All Products				
Aust. Market	100	97.5	108.1	98.6
Export Market	100	-	-	-
Total	100	97.5	108.1	98.6
Like Goods				
Aust. Market	100	97.5	108.1	98.6
Export Market	100	-	-	-
Total	100	97.5	108.1	98.6

QNP produces and sells AN only, hence sales of "All Products" and "Like Goods" are identical. QNP has experienced a decline in sales volumes and revenues in 2017.

Please refer to individual applicant company Confidential Appendix A3 schedules.

3. Complete appendix A5 (sales of other production) if you have made any:

- **internal transfers; or**
- **domestic 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.**

CSBP and Orica have some transfers of the goods that are used in the manufacture of AN. Please refer to CSBP Confidential Appendix A5 and Orica Confidential Appendix A5.

4. Complete appendix A4 (domestic sales).

The Applicant companies have completed Confidential Appendix A4 for all domestic sales by invoice in the period 1 January 2017 to 31 December 2017. Please refer to the Applicant companies' completed Confidential Appendix A4 detailing all domestic sales of AN product by category in 2017.

5. If any of the customers listed at appendix A4 (domestic sales) are associated with your business, provide details of the association. Describe the price effect of the association.

The Applicants' are not related to any of the customers detailed in their respective Confidential Appendix A4 listings.

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

The Applicant companies do not have distributor or agency agreements for sales of the goods the subject of this application.

7. Provide copies of any price lists.

As most sales by the Applicant companies are under long-term contract, the companies do not utilise list prices for these goods.

8. 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 (domestic sales).**
- **If you have issued credit notes (directly or indirectly) provide details if the credited amount has not been reported appendix A4 (domestic sales) as a discount or rebate.**

CSBP provides rebates and discounts and these are included in the selling price of the product (and are reflected in the revenue figures). Credits may be issued for operational reasons (e.g. correction of an error on the original invoice or due to a reconciliation) and are included in the revenue figures.

Orica does have some rebate structures on a small number of contracts and certainly these are exceptions rather than the norm. Rebates are based on the annual customer volumes or sales value achieving a certain threshold. Invoicing is based on the customer realising that outcome and hence pricing assumed for Appendix A4 is in line with net position.

QNP operates some rebates and discounts as required and are reflected in the selling prices in QNP Confidential Appendix A4.

9. **Select two domestic sales in each quarter of the data supplied in appendix A4 (domestic sales). Provide a complete set of commercial documentation for these sales. Include, for example, 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.**

The Applicants has selected two domestic sales from each quarter in 2017 and included a complete set of commercial documents for each sale at Confidential Attachment A-5.9 (for each Applicant company).

A-6 General accounting/administration information.

Please refer to the completed Section A-6 for each applicant company (i.e. CSBP Confidential Attachment A-6, Orica Confidential Attachment A-6 and QNP Confidential Attachment A-6).

A-7 Cost information

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

Each of the applicant companies has completed Confidential Appendices A6.1 (domestic sales) and Appendix A6.2 (export sales) for the goods the subject of this application.

A consolidated Industry Confidential Appendix A6.1 has been completed. Please refer to Industry Confidential Appendix A6.1

A-8 Injury

The principal indicators of injury are prices, volumes and profit effects – although not all of these must be evident. For this application, profit refers to amounts earned. Profitability is the ratio of profit to sales revenue. Where injury is threatened, but has not yet occurred, refer to question C.2.

1. Estimate the date when the material injury from dumped imports commenced.

The injury from the dumped ammonium nitrate (“AN”) exports to Australia from China, Sweden and Thailand commenced in 2016. It is during the 2017 calendar year, however, that the injury increased and is considered material in nature.

2. Using the data from **appendix A6 (cost to make and sell)**, complete the following tables for each model and grade of your production. Pⁿ is the most recent period.

The total AN produced in Australia is reflected in Industry Appendix A6.1 which includes all AN production volumes for the three applicant companies. There is additional production in Australia for AN over the 2014 to 2017 period by the fourth AN producer, DynoNobel (a wholly-owned subsidiary company of IncitecPivot Limited). DynoNobel’s production volumes at its Mooranbah, Queensland production facility¹ are not included in the following *Index of Production* volumes. The data includes production volumes in Australia by the three applicant companies that is destined for both domestic and export markets.

Index of production variations (model, type, grade of goods)

Period	2014	2015	2016	2017
Index	100	101.1	104.2	99.9

Notes:

1. Period is 1 January to 31 December.
2. Data is from Line 9 of Industry Confidential Appendix A6.1.

The *Index of Production* for the applicants discloses a relatively stable production rate in 2014 and 2015, a modest increase in 2016, followed by a decrease in 2017 reflecting a contraction in the market.

Index of cost variations (model, type, grade of goods)

Period	2014	2015	2016	2017
Index	100	Xxx	Xxx	xxx

Notes:

1. Period is 1 January to 31 December.
2. Data is from Line 36 of Industry Confidential Appendix A6.1.

The Applicants’ cost-to-make-and-sell AN across the injury period (i.e. 2014 to 2017) is impacted by the production utilisation rates of the companies and the reduction/expansion activities of the individual companies over this period.

The Index of Cost Variations highlights a reduction in the applicants’ aggregate CTM&S in 2016 (driven by increased production supply at CSBP) and then increases in 2017 due to reduced production utilisation rates across the three applicant companies.

¹ DynoNobel’s production capacity at Mooranbah, Queensland is approximately 340,000 tonnes per annum.

Index of price variations (model, type, grade of goods)

Period	2014	2015	2016	2017
Index	100	Xxx	Xxx	xxx

Notes:

1. Period is 1 January to 31 December.
2. Data is from Line 56 of Industry Confidential Appendix A6.1

The applicants experienced a reduction in selling prices commencing in 2016 which coincided with an increase in export volumes to Australia from the nominated exporting countries (most noticeably from China). In 2017, the exports from Sweden and Thailand emerged in significantly increased volumes, suppressing the Australian industry's selling prices.

Index of profit variations (model, type, grade of goods)

Period	2014	2015	2016	2017
Index	100	100.6	92.8	87.5

Notes:

1. Period is 1 January to 31 December.
2. Data is from Line 60 of Industry Confidential Appendix A6.1

The profit variation for the combined Applicants (measured on a \$ per tonne basis) remained stable in 2015 (when contrasted with 2014). In 2016, the unit profit declined as the Australian industry experienced increased import volumes from China. Further price suppression was evident in 2017 as exports from Sweden and Thailand at dumped prices impacted market prices.

Index of profitability variations (model, type, grade of goods)

Period	2014	2015	2016	2017
Index	100	102.1	103.3	93.9

Notes:

1. Period is 1 January to 31 December.
2. Data is from Line O64 of Confidential Appendix A6.1

The applicants' profitability was curtailed in 2017 as the industry members were unable to adjust selling prices to reflect increases in production costs.

3. **Complete appendix A7 (other injury factors).**

Where applicable to injury claims, prepare an indexed table for other injury factor(s) in the format above.

The Appendix A7 (other injury factors) has been completed by each of the applicant companies. Please refer to CSBP Confidential Appendix A7, Orica Confidential Appendix A7 and QNP Confidential Appendix A7.

Summary of injury indicators

The Applicants have experienced injury in 2017 in the following forms:

- Decline in production;
- Reduced sales volumes;
- Reduced revenues;
- Price depression;
- Price suppression; and
- Reduced profit and profitability.

The Applicant industry has also experienced injury as observed in the following “other” injury indicators in 2017:

- Reduction in return on investment;
- Lower capacity utilisation; and
- Reductions in employment numbers.

A-9 Link between injury and dumped imports.

To establish grounds to initiate an investigation there must be evidence of a relationship between the injury and the alleged dumping. This section provides for an applicant to analyse the data provided in the application to establish this link. It is not necessary that injury be shown for each economic indicator.

1. Identify from the data at appendix A2 (Australian market) the influence of the volume of dumped imports on your quarterly sales volume and market share.

The following Table A-9.1 contrasts the change in the Australian industry's domestic sales volumes for AN (i.e. "the goods") and the volumes of the dumped goods (i.e. imports from China, Sweden and Thailand).

Table A-9.1 – Trends in Applicants' sales volumes versus dumped imports

	2014	2015	2016	2017	Change in 2017 %
Applicants	100	106.3	110.8	108.2	↓ 2.6%
Dumped Imports	100	25.6	39.8	66.8	↑ 27.0%

Notes:

1. Applicants sales includes domestic sales for Orica, CSBP and QNP.
2. Dumped Imports includes P R China, Sweden and Thailand.

Source: Industry Confidential Appendix A2 – Australian Market

Table A-9.1 confirms that the Applicant companies have experienced reduced sales volumes in 2017 of approximately 2.6 per cent, whereas dumped imports from China, Sweden and Thailand have increased by 27 per cent.

The Applicants note that import volumes from China were in 2014 almost three times the level of 2017 and import volumes from Sweden were also significant (however, less than the levels of 2017). Imports from Thailand only emerged in significant volumes in 2016, increasing sharply in 2017.

With reduced export prices in 2017, imports from China, Sweden and Thailand have undercut the Australian industry's selling prices to secure increased sales volumes across the Australian market. The impact of the dumping has caused the Applicants to lose sales volumes (down by 2.6 per cent) and loss of market share (by approximately 3 per cent).

2. Use the data at appendix A2 (Australian market) to show the influence of the price of dumped imports on your quarterly prices, profits and profitability provided at appendix A6.1 (costs to make and sell). If appropriate, refer to any price undercutting and price depression evident in the market.

The quarterly selling prices for AN as sold by the Australian industry have progressively declined from relative stability in 2014, to a 6 per cent reduced level in 2016 and 2017. The Applicants' contend that the reduced prices in 2016 and 2017 can be attributed to declining export prices from China, Sweden and Thailand that increased in availability in each of 2016 and 2017.

The impact of the dumped imports on the Applicant's selling prices is reflected in the following case study examples for 2016 and 2017. It should be recalled that contracts for supply of AN in the Australian market are often for long-term periods of three to five years. The contract negotiation process is often a lengthy, protracted one, with customers typically citing the availability of import sources of supply as the "benchmark" or alternative source to the local AN supplier. The Commission noted the importance of the long-term contracts in Report

No. 312²:

“These long term contracts underpin the business cases for maintaining or constructing ammonium nitrate manufacturing plants, enabling long term planning for known volumes of supply. However, in some cases the Commission found that these contracts do not guarantee exclusive supply by the Australian manufacturer, which partially exposes the Australian industry to price competition from other sources (including imports). This type of arrangement can also be beneficial to the mining industry, as it guarantees supply for extended periods of time but also provides some flexibility, allowing the customer to switch some of their supply to another source without penalty.”

The selling prices for AN supply in Australia is relatively transparent with import volumes and prices observable in published ABS data; the market itself may be described as “price sensitive” as all parties operate in full knowledge of the availability and pricing for alternate supply. Indeed, the Commission identified in Report No. 312 the use of import offers for AN at substantially lower prices to those available from the Australian industry³:

“The Applicants have presented evidence showing that quotes are sought by Australian customers for FOB prices of ammonium nitrate in Russia at the Baltic Sea. These quotes, which are significantly lower than Australian ex-works prices, are then used to negotiate lower prices from the Australian industry.”

The Commission’s statements related to import activity in the 2014/15 investigation period – the period immediately prior to the commencement of the increase in export volumes from China, Sweden and Thailand. The then Assistant Minister’s decision in May 2016 to continue the measures on AN exports from Russia imposed a floor-price for all future exports of AN from Russia at A\$ xxx per tonne. The A\$FOB export prices for exports from China, Sweden and Thailand have been significantly below these levels throughout 2016 and 2017, and have been the principal cause of reductions in the Applicants’ selling prices into the market, as the import prices are unencumbered from any import or anti-dumping duties.

The price sensitivity of AN on the Australian market lead the Commission to conclude in Report No. 312 that⁴:

*“.....the Commission’s understanding of the chemical similarity of ammonium nitrate between suppliers and past and current market behaviour, supports the view that **price** is a key consideration in the customer’s purchasing decisions.”* (emphasis added).

Following on from the commencement of the continuation of measures inquiry involving exports of AN from the Russian Federation in September 2015, importers of AN actively sought out alternate sources of supply as Russian export prices became less attractive. From early to mid 2016, large volume shipments from China at prices lower than the Russian A\$FOB floor price were supplied into the Australian market. In early 2017, increased bulk shipment loads from China, Sweden and Thailand had emerged as viable alternate sources of dumped AN to the Russian source. In negotiations with customers in 2016 and 2017, import sources of supply for AN from China, Sweden and Thailand were prominent in negotiations. The following case studies demonstrate the price undercutting evident in the Australian market that is used by importers/customers to secure reduced prices in long-term contracts with the applicant companies.

(i) Case Study (i) – [Customer]

[Supplier] tendered for the explosives supply contract in April 2016. [Supplier] was the incumbent supplier selling bulk explosives (*contractor*) at \$xxx per tonne delivered to site. [Supplier] main competitor for the supply of AN was the importer [*company*]. [*Company*] has imported Chinese and Thai AN for use in [*location*]. [Supplier] assessed competitive positions and took account of then pricing for imports (in particular, from China and Thailand). The threat of imports resulted in [Supplier] reducing its initial offer in May 2016 down to \$xxx per tonne delivered to site. Further competitive pressure followed and in ongoing discussions with the customer and in August 2016 [Supplier] further reduced its price to \$xxx. [Supplier] secured the business at this price (i.e.

² Report No. 312 – Continuation Inquiry Concerning Certain Ammonium Nitrate exported from the Russian Federation (either directly or via Estonia), P.16.

³ *Ibid*, P. 40.

⁴ *Ibid*, P. 42.

a reduction of 8.5 per cent. Please refer to supporting documentation at [Supplier] Confidential Attachment A-9.2.1 Case study (i)).

(ii) Case Study (ii) – [Company & location]

[Supplier] tendered for the [contract] in [month & year]. [Company] was the incumbent supplier. [Company] had imported from China and Thailand for use in [location]. [Supplier] assessed competitive positions and took account of the then pricing for imports. Import threats resulted in [Supplier] initially offering a reduced price in [Month & year] at \$xxx per tonne. Further competitive pressures through discussions with the customer reduced the price to \$xxx delivered (as per the proposal in Month & year). [Supplier] was awarded the supply of business at this price. Please refer to supporting documentation at [Supplier] Confidential Attachment A-9.2.1 (case Study (ii)).

(iii) Case Study (iii) – Supply to [customer]

[Supplier] had a contract with [company] to supply AN from [plant] and [plant] AN production facilities through to [month & year]. [Supplier] commenced discussions with [customer] in mid [year] to extend this contract and to increase plant loading by supplying the majority of [customer] needs given [Supplier] xxxxx production capacity at [plant]. Pricing to [customer] at the time was \$xxx per tonne ex [plant] and \$xxx per tonne ex [plant]. In [month & year], senior [customer] personnel tabled their desire for any new arrangement based on the increased availability and more favourable terms of imported AN including:

[Details of supply requirements stated by customer].

The following timeline of events followed:

[Details of negotiations and timing]

Please refer to [Supplier] Confidential Attachment A-9.2.1 Case Study (iii).

(iv) Case Study (iv) – [customer]

[Customer] is Australia's [size & mineral type] producer. [Customer] operates [no. of mines and locations].

In [month & year] [Supplier] submitted a tender at [customer] based upon \$xxx east coast for AN. Verbal feedback received in [month & year] was that [Supplier] was [competitiveness] on relative pricing. On [date], [Supplier] updated the offer based upon [customer] feedback of [Supplier] not being competitive. On [date], [Supplier] reduced its offer to \$xxx per tonne.

[Further details of negotiations and timing].

On [date], [Supplier] notified verbally that it had received improved pricing from other suppliers and that [Supplier] needed to reduce its pricing. Following verbal confirmation on [date] that [Supplier] would be awarded [number of number] sites (excluding [mine]), [Supplier] was notified on [date] that only [details of successful mines and lost supplies]. On [date], [Supplier] advised it would only be supplying [site location] subject to honouring price and rebates (only details of awarded business).

Please refer to [Supplier] Confidential Attachment A-9.2.1 – Case Study (iv) for a chronological timeline of negotiations.

(v) Case Study (v) – [customer]

[Supplier] was the incumbent supplier at [company] that supplied AN to its mining customers (including [customer]. [Supplier] previously supplied [customer] under a [type] agreement that expired in [month & year]. During [year], [customer] requested a revision of AN pricing (then \$xxx per tonne [Supplier]; \$xxx per tonne ex [Supplier]) with a view to a more competitive offer. [Supplier] entered into discussions in good faith and proposed \$xxx ex [Supplier] and [Supplier] based upon greater than xxx per cent of supply requirements. On [date] [customer] advised it could land Chinese AN at \$xxx per tonne and had some cheaper offers. [Supplier] revised proposal to \$xxx per tonne for last contract year and \$xxx per tonne for last xxxxx years net of a proposed xx per cent volume based rebate. [Supplier] settled a contract with [customer] on [date].

In early [year & customer] [company] supplied explosives to its customer [customer]. [customer] planned to tender its explosives contract at the expiry of the current agreement with [company] in early [year]. In [month/year] [Supplier] met with [company] to discuss the supply needs for [customer] and proposed pricing based upon its then [supply] agreement with [company]. [Company] responded to the tender, as did [Supplier] and other suppliers. [Company] was awarded the explosives contract. [Company] then engaged [Supplier] regarding the supply of AN for [customer]. [Supplier] met with [company] who cited supply offers from importers ex China in the range \$xxx to \$xxx per tonne. On [date], [Supplier] revised its offer to \$xxx per tonne net of rebate (for [location supply]). On [date], [company] provided further feedback to [Supplier] and confirmed that alternative import offers were real and that the difference to [Supplier] was too great. On [date] [Supplier] revised its pricing to \$xxx per tonne net of rebate. Further meetings followed with the contract executed on [date] with effect from [date].

Please refer to [Supplier] Confidential Attachment A-9.2.1 – Case Study (v) for details supporting price reductions by [Supplier].

(vi) Case Study (vi) – Supply to [customer]

[Supplier] is the incumbent supplier to [customer] for its AN requirements to its [location, plant]. This in turn supplies customers in the [location], including [customer]. The mechanism for the supply of AN to [customer] is an import parity mechanism. [Customer] notifies [supplier] of the prevailing import parity price – in this instance [date]– the import parity mechanism is the [basis] ex China [details], and was US\$xxx per metric tonne.

The benchmark nominated by [customer] was [commercially sensitive pricing mechanism].

Please refer to [company] Confidential Attachment A-9.2.1 Case Study 5 for supporting information on the pricing mechanism for supply of AN into [location] for the local producer (i.e.[supplier]).

(vii) Case Study (vii) –[supplier] to [customer]

[Supplier] has a [period] year contract for the supply of [products] to [customer]. [Commercially-sensitive details of contract and contracted customer].

The contract with [customer] runs [period].

[contract details – commercially sensitive].

In 2017, [customer] requested a price review [timing] based upon their market knowledge (that included knowledge of import prices into QLD from China, Sweden and Thailand during 2017).

The price review negotiation was conducted between [months] 2017.

The new reduced price (based upon import parity prices at the time) is for [period]. [Supplier] has negotiated with [customer] a lower contract price resulting in an EBIT reduction of approximately \$xxx M per annum.

Further comments

The preceding examples confirm the influence of import pricing on long-term supply contracts for AN supply in the Australian market. The examples highlight how customers reference the available import supply alternatives (most notably during 2016 and 2017, these were China, Sweden and Thailand) and how the Australian industry must reduce its selling prices to meet import offers in order to secure contracts.

The Applicants submit that the import offers are used by customers (including providers of mining services) to force reductions in negotiated supply from the Australian manufacturers. The reductions in price translate to reduced profit and profitability in 2016 and further again in 2017 as the industry experiences an erosion of margin.

3. Compare the data at appendix A2 (Australian market) to identify the influence of dumped imports on your quarterly costs to make and sell at appendix A6.1 (for example refer to changes in unit fixed costs or the ability to raise prices in response to material cost increases).

The preceding section evidences how the Applicant's selling prices have fallen in 2016 and remained at depressed levels in 2017 in response to the declining export prices (at dumped levels) across both years. The export volumes from both Sweden and Thailand have increased substantially in 2017 – with sales in Australia only made possible by the comparatively low export prices to Australia during 2017.

It should be noted that the non-dumped FOB export price for AN exported from the Russian Federation as determined in the review of measures inquiry (as part of Investigation No. 312) was determined at A\$xxx per tonne for the 2014/15 year (with no subsequent review of measures having been undertaken). The weighted average export prices from Sweden and Thailand in 2017 were A\$259 and A\$382 per tonne respectively, or xx per cent and xx per cent below the Russian Federation non-dumped export price.

Weighted-average export prices from China in 2017 were xx per cent below the Russian Federation non-dumped levels.

The impact of the dumped export prices at levels that have undercut the Applicants' selling prices during 2017 has resulted in injury in the form of price suppression. The Applicant's CTM&S has increased in 2017, whereas selling prices have remained flat. The local industry has been unable to raise its selling prices to recover cost increases that have occurred as a consequence of reduced production volumes and increasing raw material

costs.

- 4. The quantity and prices of dumped imported goods may affect various economic factors relevant to an Australian industry. These include, amongst other things, the return on investment in an industry, cash flow, the number of persons employed and their wages, the ability to raise capital, and the level of investment in the industry. Describe, as appropriate, the effect of dumped imports on these factors and where applicable use references to the data you have provided at appendix A7 (other economic factors). If factors other than those listed at appendix A7 (other economic factors) are relevant, include discussion of those in response to this question.**

The production of AN involves high capital cost investment that carries with it high level of investment risk – particularly for wholly integrated ammonia to AN production facilities. It is therefore important that projected returns do materialise and that disruptive unfair trading at dumped prices is not permitted to cause long-term damage to an industry that can demonstrate significant growth and investment over recent years.

Report No 312 recognises the past investment of local industry members in the Australian AN industry. The Commission noted in commenting on the measures in place on Russian exports of AN to Australia:

“Since the measures have been imposed, the Australian industry has significantly scaled up production capacity and production volume has also increased to meet increased demand over the same period.”

It is also noted above that the nature of the long-term contracts in the industry “underpin” the investments in AN plants. When the measures on Russian exports of AN was taken in 2001, production of AN in Australia was approximately 700kt; installed capacity in 2017 is approximately 2.3 million tonnes. The investment in the industry has enabled the Australian mining industry to expand in the full knowledge of reliable, local supply for AN requirements.

In 2017, the returns on investment achieved by the Applicant companies has been impacted by the dumping resulting in reduced profit and profitability. This, in turn, has impacted the Applicants’ ROI during 2017 and likely also in 2018 to be at levels below projected ROI’s for these periods.

With reduced ROI for the industry it follows that the local producers also encounter difficulties in attracting capital for re-investment purposes. With the potential for new customers emerging, there is an ongoing need for continued re-investment in the local AN industry.

- 5. Describe how the injury factors caused by dumping and suffered by the Australian industry are considered to be ‘material’.**

The Applicants’ have undertaken major investments in local AN manufacture over the last two decades and have participated in the rapid expansion of the Australian mining industry. Over the injury period, the applicants combined annual turnover was approximately \$xxx billion, however, profits have deteriorated by approximately 14 per cent since 2015. This level of profit diminution raises concern that future export volumes from China, Sweden and Thailand at dumped prices will further impact returns such that they are not a viable investment for Australian companies.

The Applicants submit that a 14 per cent deterioration in profit over the most recent two years is ‘material’ in nature and represents a dire warning of further declines in profit unless anti-dumping measures are imposed.

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

The Australian industry for AN has continued to expand since 2001 – through the expansion of already installed production facilities and new AN investments. The industry is influenced by global prices, however, it is expected that the AN manufacturers' margin over costs remains stable and generates the required returns for ongoing reinvestment.

In 2017, however, there is a regional over capacity in AN that results in significant excess production capacity circulating on global markets. The Applicants' contend that the exports to Australia involve tonnes that cannot be consumed in the exporter's home market and, in order to maintain high production utilisation rates, the producers' turn to selected export markets to sell goods at distressed, *dumped* prices (with export prices from China, Sweden and Thailand at levels well below non-dumped Russian AN export prices).

The Applicants acknowledge the shift in the market to an over-supply position, however, it is considered that despite this factor, the injury resulting from the dumping is *material* in its own right.

7. This question is not mandatory, but may support your application. Where trends are evident in your estimate of the volume and prices of dumped imports, forecast their impact on your industry's economic condition. Use the data at appendix A2 (Australian market), appendix A6 (cost to make and sell), and appendix A7 (other economic factors) to support your analysis.

The Applicants' have demonstrated in this application for anti-dumping measures on AN exported from China, Sweden and Thailand that exports to Australia during 2017 have been at the following margins of dumping:

- China – 24 per cent;
- Sweden – 56 per cent; and
- Thailand – 41 per cent.

The margins of dumping determined are substantial. Importers of AN from China, Sweden and Thailand have relied upon the dumped prices to secure sales on the Australian market (at levels that undercut the Australian manufacturers) that could otherwise be supplied from local production. The import volumes from the three exporting countries account for 49 per cent of total import volume in 2017. Prior to 2017, imports from Sweden and Thailand were minor, however, the dumped prices have enabled exporters to grow export volumes rapidly throughout 2017.

The application demonstrates that the impact of the dumping on the Applicant companies during 2017 has been significant. The companies have experienced price suppression and an erosion of margin, resulting in a 14 per cent deterioration in profit since 2015.

Investment in AN production is a high risk, capital intensive, venture. The expected returns on investment therefore reflect this risk. Unfairly priced imports represent a significant threat to the long-term returns in the Australian AN industry.

Additionally, the dumped imports significantly impact the broader Australian economy through the economic impact on the local communities in which these manufacturing operations are located. Not only is there the direct employment opportunities of those directly associated with the plant, but also that of suppliers such as contractors, maintenance and service providers, the support to local community activities such funding of local charities, schools and community organisations and the broader economic multiplier effect on local small town economies.

The Applicants are therefore seeking the Commission to commence a formal investigation into the alleged dumping of AN exported to Australia from China, Sweden and Thailand.

Following the commencement of an investigation, the Applicants will be seeking the Commissioner to impose provisional measures as early as practicable from Day 60 of the investigation. The provisional measures are warranted to address the significant margins of dumping evident, and to prevent further injury from the dumped imports to Australia.

PART B

DUMPING

IMPORTANT

All questions in Part B should be answered even if the answer is 'Not applicable' or 'None' (unless the application is for countervailing duty only: refer Part C). If an Australian industry comprises more than one company/entity, Part B need only be completed once.

For advice about completing this part please contact the Commission's client support section on:

Phone: 13 28 46
Fax: (03) 8539 2499
Email: clientsupport@adcommission.gov.au

B-1 Source of exports.

1. Identify the country(ies) of export of the dumped goods.

The goods the subject of this application have been exported from the People's Republic of China ("China"), Sweden and Thailand.

2. Identify whether each country is also the country of origin of the imported goods. If not, provide details.

The country of origin of the goods is also understood to be the country of export of the goods.

3. If the source of the exports is a non-market economy, or an 'economy in transition' refer to Part C.4 and Part C.5 of the application.

China, Sweden and Thailand are considered by Australian authorities to be 'market economy' countries for the purposes of Australia's Anti-Dumping provisions.

4. Where possible, provide the names, addresses and contact details of:

- **producers of the goods exported to Australia;**
- **exporters to Australia; and**

(i) China – producers/exporters

- Shaanxi Xinghua Chemistry Co., Ltd
Xingping City, Shaanxi Province
713100 P R China
Tel: 86 0 29 3883 8007/12
Fax: 86 0 29 3882 2614
www.snxchem.com
- Lizhou Chemical Industry Co., Ltd
No. 67, Beacon Road
Zhuang Autonomous Region
Liuzhou, 545002 China
Tel: +86 72 251 4332
www.izhg.cn

The Lizhou Chemical Industry Co., Ltd returned losses in 2015 and 2016, and advised that it planned to deliver a profit for the 2017 year "after excluding two extraordinary profits and losses including financial subsidy given and some non-current asset disposed by the Lizhou Finance Bureau" was estimated at between RMB 670 million and RMB 655 million⁵.

- Kaifeng Jinkai Chemical Co., Ltd
No.1 Auxiliary, No. 89
West Section
Kaifeng 475100 China
Tel: +86 37 8326 6692
Fax: +86 37 1338 3346

Kaifeng Jinkai Chemical Industry Co., Ltd is the largest industrial fertilizer company in Henan province with over 1 million tonnes of capacity of ammonia, and 360,000 tonnes of ammonium nitrate.

- Tianjin Coal Group Co., Ltd

⁵ Refer Bloomberg "Liuzhou Chemical Industry Co., Ltd" Company Overview at www.bloomberg.com/research/stocks/private/snapshot.asp?privcapId

(ii) Sweden – producers/exporters

- Yara AB – Koping
P.O. Box 908
S-731 29 Koping
Sweden
Tel: +46 22 12 78 00
Fax: +46 22 12 79 80
www.yara.com

Yara manufactures 360,000 tonnes of AN at its Koping manufacturing site in Sweden.

(iii) Thailand – producers/exporters

- Thai Nitrate Company Co., Ltd (“TNC”)

Factory Address

140/7 Moo 4
Sukhumvit Rd
Tambol Tapong
Muang Rayong District,
Rayong 21000 Thailand
Tel: +66 38 915 407 16
Fax: +66 38 915 400, +66 38 915 401

Head Office:

26/56 21st Floor
TPI Tower Building
Chan Tad Mai Road
Thungmahamek, Sathorn
Bangkok 10120 Thailand
Tel: +662 6786600-9
Fax: +662 6785 484
www.thainitrate.com

Thai Nitrate Company Co., Ltd (“TNC”) produces approximately 100,000 tonnes of AN per annum.

- **importers in Australia.**

The following companies are understood to be importers of the AN from the countries nominated in this application:

- (i) Nitro Sibr Australia Pty Ltd
Site 59, Kalgoorlie Explosives Reserve
Emin Street North
Kalgoorlie WA 6430
Tel: +61 8 9022 3821

Nitro Sibir has sourced AN from China, Thailand and Russia throughout the injury period.

- (ii) Downer Blasting Services
Trinity Business Campus
39 Delhi Road
North Ryde NSW 2113
Tel: +61 2 9468 9700
Fax: +61 2 9813 8915

Downer has imported AN from Sweden in 2017 (as well as other sources prior to 2017).

- (iii) AECI Australia PTY Ltd trading as AEL Mining Services
320 Adelaide Street
Brisbane Queensland 4000
Tel: +61 7 3221 0168
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5. If the import volume from each nominated country at Appendix A.2 (Australian Market) does not exceed 3% of all imports of the product into Australia refer to Part C.6 of the application.

In 2017, imports of the goods from P R China, Sweden and Thailand individually exceeded 3 per cent of the total import volume into Australia. The following Table B-1.5 confirms the volumes imported into Australia from the nominated countries over the last three years.

Table B-1.5 – Import volumes of ammonium nitrate in to Australia 2015 – 2017 (kilograms)

Country	2015 (kgs)	2016 (kgs)	2017 (kgs)	Per cent of total Import volume in 2017
P R China	19,690,984	28,476,090	19,960,110	17.9 %
Sweden	43,000	1,076,440	22,715,100	20.3 %
Thailand	1,485,800	3,209,340	12,256,660	11.0 %
Sub-total	21,219,784	32,761,870	54,931,870	49.2 %
Russia	18,267,660	20,413,490	17,494,220	15.7 %
Other	81,187,051	83,038,830	39,356,050	35.2 %
Total	120,674,495	136,214,190	111,782,140	100.1%

Source: ABS data.

The applicants highlight that imports of AN increased in 2016 from the levels of 2015 and returned to the 2015 levels in 2017. Meanwhile, imports from Sweden and Thailand in 2015 were approximately 1 per cent of the total import volume in 2015, and increased rapidly in 2017 to account for 31.3 per cent of the total import volume for AN into Australia, with the greatest increase in imports from Sweden from less than 1 per cent in 2016 to 20 per cent in 2017.

6. In the case of an application for countervailing measures against exports from a developing country, if the import volume from each nominated country at Appendix A.2 (Australian Market) does not exceed 4% of all imports of the product into Australia refer to Part C.6 of the application.

This application relates to exports from the nominated countries at dumped prices only. Hence, this question is not applicable.

B-2 Export price

Possible sources of information on export price include export price lists; estimates from the Australian Bureau of Statistics; a deductive export price calculation from the Australian selling price of the imported goods; export sales quotations or invoices; foreign government export trade clearances.

1. **Indicate the FOB export price(s) of the imported goods. Where there are different grades, levels of trade, models or types involved, an export price should be supplied for each.**

The FOB export prices for AN from P R China, Sweden and Thailand have been obtained from published Australian Bureau of Statistics (ABS) import data. Table B-2.1 details the average monthly A\$FOB prices for AN imported from each country.

Table B-2.1 – Monthly A\$FOB values for ammonium nitrate exported from P R China, Sweden and Thailand

Month	P R China Qty (MT)	P R China A\$FOB	Sweden Qty (MT)	Sweden A\$FOB	Thailand Qty (MT)	Thailand A\$FOB
Jan 17	6008.92	380.18	6009.6	194.63	240.72	390.80
Feb 17	60.19	398.11			120.36	375.23
	5215.99	372.49			4012	347.72
	200.8	444.41				
	281.12	446.08				
Mar 17					120.36	368.88
Apr 17	281.12	446.08			120.36	371.98
	204.61	437.00				
May 17	281.12	446.14	7985	305.73	120.36	378.14
	591.87	522.39				
Jun 17	401.6	389.54				
	324.61	455.05				
Jul 17	4475.58	361.54				
	260.79	435.04				
	260.5	404.49				
Aug 17	499.28	398.18			200.6	400.08
	23.64	188.33				
	60.19	420.43				
Sep 17	23.46	730.44			802.4	397.20
Oct 17	288.8	424.39	6009.6	247.36	641.92	401.93
			2000	247.76		
			107.7	384.53		
Nov 17	94.54	184.17	107.78	390.57	962.88	427.11
	101.2	202.97				
Dec 17	20.18	251.91	387.72	425.15	4714.1	396.33
			107.7	329.58	200.6	410.94

Total	19,960.110	384.03	22,715.1	258.78	12,256.66	382.48

Source: ABS data included at Confidential Attachment B-1.5.

The Applicants' have detailed the separate monthly shipments from the published import data in Table B-2.1. It is noted that some shipments are containerised (i.e. smaller volume) with the remainder as large, bulk shipments.

2. Specify the terms and conditions of the sale, where known.

The A\$FOB export prices in Table B-2.1 are at the export port, loaded for shipment.

3. If you consider published export prices are inadequate, or do not appropriately reflect actual prices, please calculate a deductive export price for the goods. Appendix B1 (Deductive Export Price) can be used to assist your estimation.

The Applicants' consider that the published ABS export price data are adequate for fair comparison purposes.

4. It is important that the application be supported by evidence to show how export price(s) have been calculated or estimated. The evidence should identify the source(s) of data.

Please refer to Confidential Attachment B-1.5 for supporting information on export prices for the nominated countries.

B-3 Selling price (normal value) in the exporter's domestic market.

Possible sources of information about domestic selling prices in the country of export include: price lists for domestic sales (with information on discounts); actual quotations or invoices relating to domestic sales; published material providing information on the domestic selling prices; or market research undertaken on behalf of the applicant.

1. State the selling price for each grade, model or type of like goods sold by the exporter, or other sellers, on the domestic market of the country of export.

The Applicants' have obtained domestic selling price information for AN sold on the Swedish and Thai domestic markets. Domestic selling price information is not available from newsletters or industry publications in P R China (please refer to Section B-4.1 below for Chinese normal value information).

Domestic selling prices in Sweden and Thailand for AN sold during 2017 are detailed in Tables B-3.1 and B-3.2 below.

(i) Sweden

Swedish domestic prices are for porous prill AN sold at the ex-factory level.

Table B-3.1 – AN domestic selling prices (porous prill) – Sweden (2017), per metric tonne

Period	AN price 100% basis (SEK) ex works	USD (ex works)	A\$ (ex works)
Jan-Mar 2017			375.23
Apr-Jun 2017			440.36
Jul-Sep 2017			422.33
Oct-Dec 2017			395.33

Source: [Company] Confidential Attachment B-3.1.1 – Sweden normal value information.

(ii) Thailand

One of the Applicant companies has access to domestic selling price information for a distributor in Thailand. The actual domestic prices are for delivery in the period late 2015 to mid 2016.

The obtained domestic prices have been adjusted to determine domestic selling prices, on a monthly basis during 2017. The adjustment is based upon movements in the export price for AN exported from China, and shifts in the regional ammonia price (the key raw material used in the manufacture of AN).

Domestic selling prices for AN sold in Thailand domestically are show in Table B-3.1.2 (for prilled AN equivalent).

Table B-3.1.2 – AN domestic selling prices – Thailand 2017, per metric tonne

Month	Price (USD) per tonne, delivered	A\$ per tonne
Jan 2017		543.41
Feb 2017		536.47
Mar 2017		541.66
Apr 2017		543.79
May 2017		544.46
Jun 2017		530.74
Jul 2017		537.74
Aug 2017		509.39
Sep 2017		509.95
Oct 2017		522.14
Nov 2017		538.26
Dec 2017		552.10

Source: [Company] Confidential Attachment B-3.1.2 – Thai normal value information.

2. **Specify the terms and conditions of the sale, where known.**

The domestic selling prices for AN sold in Sweden are at the ex-factory level. Domestic sales in Thailand are delivered to customer selling prices.

3. **Provide supporting documentary evidence.**

Please refer to Confidential Attachments B-3.1.1 and 3.1.2.

4. **List the names and contact details of other known sellers of like goods in the domestic market of the exporting country.**

The producers in each of Sweden and Thailand are the sole local producers of AN.

B-4 Estimate of normal value using another method.

This section is not mandatory. It need only be completed where there is no reliable information available about selling prices in the exporter's domestic market. Other methods of calculating a normal value include:

- the cost to make the exported goods plus the selling and administration costs (as if they were sold in the exporter's domestic market) plus an amount for profit (if applicable);
- OR
- the selling price of like goods from the country of export to a third country.

1. Indicate the normal value of the like goods in the country of export using another method (if applicable, use appendix B2 Constructed Normal Value).

The Applicants have not been able to establish domestic selling prices for AN sold on the domestic market in P R China ("China"). Domestic selling prices for AN are not disclosed in industry newsletters or reports, and are not widely communicated.

As an alternative, a member of the Applicant industry has access to a number of sources under subscription that examine production cost economics for certain Chinese chemical industries, including AN.

The production cost economics for four AN chemical manufacturers in China that rely on locally sourced coal and gas for the production of AN, is included at Confidential Attachment B-4.1.1.

The costs include full variable and fixed costs (including amounts for depreciation), plus baggage and storage US\$22 per tonne, and an amount for Selling and general administration (uplift of 5 per cent). The Value-Added Tax of 17 per cent is also included (there is not VAT rebate available on AN for export from China).

Constructed normal values for AN in 2017 are included in the following Table B-4.1.

Table B-4.1 – Constructed domestic selling prices – AN in China

Period	Producer – Liuzhou USD/MT	Producer – Xinghua USD/MT	Producer - Jinkai USD/MT	Producer – Tianji USD/MT
2017	\$385.15	\$398.57	\$429.44	\$424.07

Notes:

1. Price includes costs of packaging and bagging;
2. Lower normal value determined for bulk shipments;
3. Selling & Admin expenses calculated at 14.7 per cent of turnover sourced from Shaanxi Xinghua financial information, 2016 (refer Confidential Attachment B-4.1).
4. Normal value includes 17 per cent VAT, not refunded on export.

Source: Confidential Attachment B-4.1.

The Applicants have used an average of the calculated Chinese normal values for the four identified producers to calculate a normal value for fair comparison purposes.

2. Provide supporting documentary evidence.

Please refer to Confidential Attachment B-4.1 for supporting normal value information for AN manufactured in China.

B-5 Adjustments.

A fair comparison must be made between the export price and the normal value. Adjustments should be made for differences in the terms and circumstances of the sales such as the level of trade, physical characteristics, taxes or other factors that affect price comparability.

1. **Provide details of any known differences between the export price and the normal value. Include supporting information, including the basis of estimates.**

Normal value information for AN in China and Sweden is at the ex-factory level. In respect of domestic price information for Thailand, the prices are on a delivered into store basis.

The A\$FOB export prices obtained from ABS data are at the FOB point, country of export and include inland freight in the exporting country.

For fair comparison purposes, the normal values for China and Sweden require an uplift to account for inland freight included that is included in the published export prices. The applicants do not have accurate inland freight costs in China (estimates only) or Sweden, and has therefore not made adjustments to normal value for inland freight costs for the delivery of the goods to export port.

For Thailand, no adjustment to normal value has been made as it is considered that freight to port and domestic freight to customer are comparable.

2. **State the amount of adjustment required for each and apply the adjustments to the domestic prices to calculate normal values. Include supporting information, including the basis of estimates.**

No adjustments have been made.

B-6 Dumping margin.

1. **Subtract the export price from the normal value for each grade, model or type of the goods (after adjusting for any differences affecting price comparability).**

The applicants have calculated weighted average dumping margins for AN exported from China, Sweden and Thailand during 2017.

Table B-6.1 summarizes the monthly margins determined for 2017.

Country	Dumping Margin A\$/MT	Dumping Margins As % of Export Price	
P R China	91.50	23.83	
Sweden	145.75	56.33	
Thailand	157.80	41.26	

Please refer to Confidential Attachment B-6.1 for weighted average dumping margin calculations.

2. **Show dumping margins as a percentage of the export price.**

Please refer to Table B-6.1 above for dumping margins as a percentage of export price.

PART C

SUPPLEMENTARY SECTION

IMPORTANT

Replies to questions in Part C are not mandatory in all instances, but may be essential for certain applications.

For advice about completing this part please contact the Commission's client support section on:

Phone: 13 28 46
Fax: (03) 8539 2499
Email: clientsupport@adcommission.gov.au

C-1 Subsidy

This section must be completed where countervailing duties are sought to offset foreign government assistance through subsidies to exporters or producers.

If the application is for countervailing duty alone, the domestic price information required by Part B of the application need not be supplied.

Responses to questions A-9 will need to identify the link between subsidisation and injury.

1. **Identify the subsidy paid in the country of export or origin. Provide supporting evidence including details of:**
 - (i) **the nature and title of the subsidy;**
 - (ii) **the government agency responsible for administering the subsidy;**
 - (iii) **the recipients of the subsidy; and**
 - (iv) **the amount of the subsidy.**

This application for measures on ammonium nitrate exported from The People's Republic of China, Sweden and Thailand relates to exports at "dumped" prices only, and does not extend to a request for countervailing measures.

C-2. Threat of material injury

Address this section if the application relies solely on threat of material injury (ie where material injury to an Australian industry is not yet evident).

1. **Identify the change in circumstances that has created a situation where threat of material injury to an Australian industry from dumping/subsidisation is foreseeable and imminent, for example by having regard to:**
 1. **the rate of increase of dumped/subsidised imports;**
 2. **changes to the available capacity of the exporter(s);**
 3. **the prices of imports that will have a significant depressing or suppressing effect on domestic prices and lead to further imports;**
 4. **inventories of the product to be investigated; or**
 5. **any other relevant factor(s).**

This application is not based on a threat of material injury to the Australian industry. The Applicants have demonstrated that AN exported to Australia from China, Sweden and Thailand during 2017 has caused material injury to the Australian industry.

The Applicants, therefore, have not relied upon a 'threat' of injury to warrant the imposition of measures.

2. **If appropriate, include an analysis of trends (or a projection of trends) and market conditions illustrating that the threat is both foreseeable and imminent.**

The Applicants have demonstrated that injury already experienced by the industry is material and not merely threatened.

C-3. Close processed agricultural goods

Where it is established that the like (processed) goods are closely related to the locally produced (unprocessed) raw agricultural goods, then – for the purposes of injury assessment – the producers of the raw agricultural goods form part of the Australian industry. This section is to be completed only where processed agricultural goods are the subject of the application. **Applicants are advised to contact the Commission’s client support section before completing this section.**

1. Fully describe the locally produced raw agricultural goods.

Ammonium nitrate is not a raw agricultural product.

2. Provide details showing that the raw agricultural goods are devoted substantially or completely to the processed agricultural goods.

As AN is not a raw agricultural product, this question does not apply.

3. Provide details showing that the processed agricultural goods are derived substantially or completely from the raw agricultural goods.

As AN is not a raw agricultural product, this question does not apply.

4. Provide information to establish either:

- a close relationship between the price of the raw agricultural goods and the processed agricultural goods; or
- that the cost of the raw agricultural goods is a significant part of the production cost of the processed agricultural goods.

As AN is not a raw agricultural product, this question does not apply.

C-4. Exports from a non-market economy

Complete this section only if exports from a non-market economy are covered by the application. The domestic price information required by Part B of the application need not be supplied if this question is answered.

Normal values for non-market economies may be established by reference to selling prices or to costs to make and sell the goods in a comparable market economy country.

1. Provide evidence the country of export is a non-market economy. A non-market economy exists where the government has a monopoly, or a substantial monopoly, of trade in the country of export and determines (or substantially influences) the domestic price of like goods in that country.

China, Sweden and Thailand are not considered ‘non-market economy’ countries for the purposes of Australia’s Anti-Dumping and Countervailing provisions. This question therefore does not apply to the goods the subject of this application.

2. Nominate a comparable market economy to establish selling prices.

This question does not apply to the goods the subject of this application.

3. Explain the basis for selection of the comparable market economy country.

This question does not apply to the goods the subject of this application.

4. **Indicate the selling price (or the cost to make and sell) for each grade, model or type of the goods sold in the comparable market economy country. Provide supporting evidence.**

This question does not apply to the goods the subject of this application.

C-5 Exports from an 'economy in transition'

An 'economy in transition' exists where the government of the country of export had a monopoly, or substantial monopoly, on the trade of that country (such as per question C-4) and that situation no longer applies.

Complete this section only if exports from an 'economy in transition' are covered by the application. **Applicants are advised to contact the Commission's client support section before completing this section**

1. **Provide information establishing that the country of export is an 'economy in transition'.**

China, Sweden and Thailand are not considered 'economy in transition' countries for the purposes of Australia's Anti-Dumping and Countervailing provisions. This question therefore does not apply to the goods the subject of this application.

2. **A price control situation exists where the price of the goods is controlled or substantially controlled by a government in the country of export. Provide evidence that a price control situation exists in the country of export in respect of like goods.**

This question does not apply to the goods the subject of this application.

3. **Provide information (reasonably available to you) that raw material inputs used in manufacturing/producing the exported goods are supplied by an enterprise wholly owned by a government, at any level, of the country of export.**

This question does not apply to the goods the subject of this application.

4. **Estimate a 'normal value' for the goods in the country of export for comparison with export price. Provide evidence to support your estimate.**

This question does not apply to the goods the subject of this application.

C-6 Aggregation of Volumes of dumped goods

Only answer this question if required by question B-1.5 of the application and action is sought against countries that individually account for less than 3% of total imports from all countries (or 4% in the case of subsidised goods from developing countries). To be included in an investigation, they must collectively account for more than 7% of the total (or 9% in the case of subsidised goods from developing countries).

	Quantity	%	Value	%
All imports into Australia		100%		100%
Country A*				
Country B*				
etc*				
Total				

* Only include countries that account for less than 3% of all imports (or 4% in the case of subsidised goods)

from developing countries). Use the data at [Appendix A.2](#) (Australian Market) to complete the table.

The goods exported from China, Sweden and Thailand individually exceed 3 per cent of total import volumes into Australia during 2017.

APPENDICES

Appendix A1	Industry Australian Production
Appendix A2	Industry Australian Market
Appendix A3	Sales Turnover (individual Applicant companies only)
Appendix A4	Domestic Sales (individual Applicant companies)
Appendix A5	Sales of Other Production (individual)
Appendix A6.1	Industry Cost to Make and Sell (& profit) Domestic Sales
Appendix A6.2	Cost to Make and Sell (& profit) Export Sales (Individual)
Appendix A7	Other Injury Factors (Individual)
Appendix A8	Authority to Deal With Representative (Individual)
Appendix B1	Deductive Export Price (N/A)
Appendix B2	Constructed Normal Value (P R China)