



Supplementary Exporter Questionnaire

Exporter: Diler Demir Celik Endustri ve Ticaret Anonim Sirketi
(DDC)

Case number: 495

Product: Steel reinforcing bar

From: The Republic of Turkey

Investigation period: 1 October 2017 to 30 September 2018

Response due by: Wednesday, 15 January 2020

Case manager: Tim King

Phone: + 61 3 8539 2447

Return completed questionnaire to:
investigations3@adcommission.gov.au

Anti-Dumping Commission website: www.adcommission.gov.au

QUESTIONS

1. Reference is made to the applicant's submission dated 6 December 2019¹ and the applicant's comments in relation to the findings made by the investigating authority of the Trade Practices Section of the Malaysian Ministry of International Trade and Industry. In a Preliminary Determination Report published on 5 September 2019 (copy attached) by the Malaysian investigating authority, the following statement was made in relation to determining the normal value for DDC:

"the IA selected sales to all customers based on the same product codes sold to Malaysia during the POI" (emphasis added)²

Can you please provide the following information in relation to this finding made by the Malaysian investigating authority:

- a. outline in detail the methodology utilised by the Malaysian investigating authority in matching export product codes to domestic product codes;

RESPONSE:

The Ministry of International Trade and Industry ("MITI") did not utilize a methodology in particular in matching export product codes to domestic product codes. In the preliminary dumping margin calculation that was released on September 23, 2019 the MITI used one single weighted average normal value and export price which covered all sales, regardless of grade.

Regarding the statement in the preliminary report; MITI did not request a compulsory and detailed model type for reporting purposes. Instead, in the Malaysian antidumping investigation, the MITI accepted Diler's proposal to compare sizes for product matching purposes. To comply with the MITI's product matching methodology, Diler reported and assigned all product types from XXX to XXX and XXX to XXX. The letter referred to either "straight" or "coiled", whilst the number referred to the XXXXXXXXXXXXXXXX [characteristic].

In the domestic market, there were XXXXXXXXXXXXXXXX of both straight rebar and rebar in coils. Similarly, in the Malaysian market, there were XXXXXXXXXXXXXXXX of both straight rebar and rebar in coils sold to Malaysia. MITI excluded all products of rebar in coil noting that rebar in coil was not within the scope of investigation.

After removing rebar in coils, MITI established that XXXXXXXXXXXXXXXX of straight rebar existed in home market sales and XXXXXXXXXXXXXXXX of straight

¹ EPR document number 40

² See page 21 of the Malaysian Preliminary Report

rebar existed in Malaysian market sales. As noted in the preliminary determination report, MITI relied only on those domestic products codes which corresponded to the XXXXXXXXXX product codes exported to the Malaysian market (i.e. XXXXXXXXXX XXXXXXXXXX). The remaining XXXXXXXXXX domestic straight rebar XXXXXXXXXXXXXX which did not match to the XXXXXXXXXXXXXXXXXXXX were excluded. Accordingly, MITI removed these XXXXXXXXXXXXXXXXXXXX from its weighted average normal value calculations. MITI then calculated a single weighted average normal value and a single weighted export price using XXXXXXXXXX product codes which MITI refers to as “same product codes”. As such, MITI did not conduct a model to model price comparison.

Importantly, MITI’s established product codes were based on XXXXXXXXXX (characteristic) and did not further distinguish or categorise products according to grade. It is Diler’s understanding that the decision by MITI to compare weighted average normal value and export price using sales of comparable XXXXXXXXXX (characteristic), whilst disregarding grade, was based on submitted and verified information which confirmed that XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXXX [Diler’s production process].

Further, the unit selling prices for the different rebar grades displayed only XXXXXXXXXXXXXXXXXXXXXXXXXXXX [price relativities]. This is consistent with the findings of the Commission’s verification of Diler’s sales information which confirmed the view that higher rebar grades do not reflect higher unit selling prices.

b. specify the domestic product codes and the export product codes used to match sales for establishing the normal value; and

RESPONSE:

As noted above, MITI did not utilize a methodology in particular in matching export product codes to domestic product codes. In the preliminary dumping margin calculation that was released on September 23, 2019 the MITI used one single weighted average normal value and export price covering all sales, regardless of grade and any other parameter except for XXXXXXXXXX [characteristic]. As such all domestic product codes with the same XXXXXXXXXX [characteristic] as Malaysian export sales were used in establishing normal value.

c. specify the relevant grades of those export and domestic sales product codes used to establish the normal value and the export value.

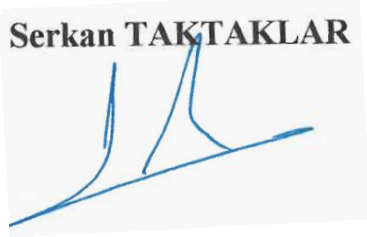
RESPONSE:

Please see response to questions a and b above. Diler again confirms that grade was not a relevant criteria used by the MITI in comparing Diler's exports sales to Malaysia with its domestic sales. All domestic straight rebar (irrespective of grade) of the same XXXXXXXXXXXXX [characteristic] as the exported goods, were used to establish normal values.

EXPORTER'S DECLARATION

I hereby declare that Diler Demir Celik Endustri ve Tecaret A.S. have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this submission is complete and correct to the best of my knowledge and belief.

Name : Serkan TAKTAKLAR

Signature : 

Position in

Company : Board Member / Sales Director

Date : 14 January 2020