

Consideration report number: 501

Application for a dumping duty notice

Submitted by: Galintel Pty Ltd

In relation to solid base angle exported to Australia from
the People's Republic of China

26 February 2019

Customs Act 1901 Part XVB

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Abbreviations

Abbreviations/short form	Full reference
ABF	Australian Border Force
ABS	Australian Bureau of Statistics
The Act	<i>Customs Act 1901</i>
AS/NZ	Australia and New Zealand Standard
China	the People's republic of China
the Commission	the Anti-Dumping Commission
the Commissioner	the Commissioner of the Anti-Dumping Commission
CTMS	cost to make and sell
EPR	Electronic Public Record
FOB	Free on board
Galintel	Galintel Pty Ltd (also referred to as the applicant)
GOC	Government of China
the goods	the goods the subject of the application
HRC	hot rolled coil
housing starts	dwelling unit commencements
Ingal	Ingal Building Systems
the Manual	Dumping and Subsidy Manual
the Material Injury Direction	<i>Ministerial Direction on Material Injury 2012</i>
the Minister	Minister for Industry, Science and Technology
NSW	New South Wales
REP	Final Report
SG&A	selling, general and administrative
SEF	Statement of Essential Facts
VAT	value added tax
Vespol	Vespol Pty Ltd
Vincent Buda	Vincent Buda Company
Yongkang Vincent	Yongkang Vincent Import and Export Company

1 Findings and recommendations

This report provides the result of the consideration by the Anti-Dumping Commission (the Commission) of an application under subsection 269TB(1) of the *Customs Act 1901* (the Act)¹ by Galintel Pty Ltd (the applicant or Galintel) for the publication of a dumping duty notice in respect of solid base angle that has been or is likely to be or may be imported into Australia from the People's Republic of China (China).

Galintel alleges that the Australian industry for solid base angles has suffered material injury caused by solid base angles exported to Australia from China at dumped prices.

1.1 Findings

In accordance with subsection 269TC(1), the Commission has examined the application and is satisfied that:

- the application complies with the requirements of subsection 269TB(4) (as set out in section 2.2 of this report)
- there is an Australian industry in respect of like goods (as set out in section 2.4 of this report)
- there appear to be reasonable grounds for the publication of a dumping duty notice in respect of the goods the subject of the application (as set out in sections 3, 4 and 5 of this report).

1.2 Recommendations

Based on the above findings, the Commission recommends that the Commissioner of the Anti-Dumping Commission (Commissioner) decide not to reject the application and initiate an investigation to determine whether a dumping duty notice should be published.

The Commission observes that the applicant has provided data up to 30 September 2018 as part of its application. As outlined in the Commission's *Dumping and Subsidy Manual* (the Manual), the investigation period specified by the Commission is generally the 12 months preceding the initiation date and ending on the most recent quarter.²

The Commission therefore recommends that:

- exports to Australia during the investigation period 1 January 2018 to 31 December 2018 be examined for dumping, and
- details of the Australian market from 1 January 2015 be examined for injury analysis purposes.

The Commission recommends that the applicant be required to submit a further quarter of data (up to 31 December 2018), to ensure that the investigation examines contemporary data.

If the Commissioner agrees with these recommendations, the Commissioner must give public notice of the decision in accordance with the requirements set out in subsection 269TC(4).

¹ All legislative references in this report are to the *Customs Act 1901* unless otherwise specified.

² See Chapter 3 of the Manual, available at www.adcommission.gov.au.

2 The application and the Australian industry

2.1 Lodgement of the application

2.1.1 Legislative framework

The procedures for lodging an application are set out in section 269TB.

The procedures and timeframes for the Commissioner's consideration of the application are set out in section 269TC.

2.1.2 The Commissioner's timeframe

Event	Date	Details
Application lodged and received by the Commissioner under subsections 269TB(1) and (5)	4 December 2018	The Commission received an application from Galintel which alleges that the Australian industry has experienced and may experience material injury caused by solid base angle imported into Australia from China at dumped prices.
	19 December 2018 and 10 January 2019	The Commission notified Galintel that the application contained certain important deficiencies, which, if left unaddressed, created doubt regarding the reasonableness of the grounds for the publication of a dumping duty notice.
Applicant provided further information in support of the application under subsection 269TC(2A)	21 December 2018, 2 January 2019, 18 January 2019, 1 February 2019, 6 February, 7 February 2019, 19 February 2019 and 21 February 2019.	The Commission received further information in support of the application which restarted the 20 day period for consideration of the application.
Consideration decision due under section 269TC(1)	13 March 2019	The Commissioner shall decide whether to reject or not reject the application within 20 days after the applicant provided further information.

Table 1 – Application assessment timeline

2.2 Compliance with subsection 269TB(4)

2.2.1 Finding

Based on the information submitted by the applicant, the Commission considers that the application complies with subsection 269TB(4).

2.2.2 Legislative framework

Subsection 269TC(1) requires that the Commissioner reject an application for a dumping duty notice if, among other things, the Commissioner is not satisfied that the application complies with subsection 269TB(4).

2.2.3 The Commission's assessment

Table 2 below summarises the Commission's assessment of compliance with subsection 269TB(4).

Requirement for the application	Details
Lodged in writing under subsection 269TB(4)(a)	The applicant lodged in writing confidential and non-confidential versions of the application. The non-confidential version of the application can be found on the electronic public record on the Commission's website at www.adcommission.gov.au .
Lodged in an approved form under subsection 269TB(4)(b)	The application is in the approved form (B108) for the purpose of making an application under subsection 269TB(1).
Contains such information as the form requires under subsection 269TB(4)(e)	The applicant provided: <ul style="list-style-type: none"> • a completed declaration; • answers to all questions that were required to be answered by the applicant; • completed all appendices; and • sufficient detail in the non-confidential version of the application to enable a reasonable understanding of the substance of the information submitted in confidence.
Signed in the manner indicated in the form under subsection 269TB(4)(d)	The application was signed in the manner indicated in Form B108 by a representative of the applicant.
Supported by a sufficient part of the Australian industry under subsection 269TB(4)(e) and determined in accordance with subsection 269TB(6)	Galintel claims to be the only Australian producer of cold roll formed solid base angle, made from hot rolled coil (HRC) steel. The Commission's own research did not identify other Australian producers of solid base angle. Based on the information supplied by the applicant, the Commission considers that the application is supported by a sufficient part of the Australian industry under subsection 269TB(4)(e), and complies with the requirements of subsections 269TB(6)(a) and (b).
Lodged in the manner approved under section 269SMS for the purposes subsection 269TB(4)(f)	The application was lodged in a manner approved in the Commission's instrument made under section 269SMS, being by email to an address nominated in that instrument. ³ The application was therefore lodged in a manner approved under subsection 269SMS(2).

Table 2 Compliance with subsection 269TB(4)

2.3 The goods the subject of the application

Table 3 below outlines the goods as described in the application and its corresponding tariff classification.

Full description of the goods, as subject of the application
<i>Solid base angle, made from hot rolled coil steel, alloyed or non-alloyed, cold roll-formed, whether or not galvanised.</i>

³ *Form and manner of lodging and withdrawing applications relating to anti-dumping matters: Instrument under section 269SMS of the Customs Act 1901*, 23 November 2018.

Further information

Galintel's application notes the following additional information:

The subject goods are typically described as "solid base angle" or "Budabar" or "B-bar" or "ribbed angle Lintel" or "L-section" and are typically used as lintels.

The goods are generally supplied in section sizes being nominally 100mm x 100mm x 6mm or 150mm x 100mm x 6mm ranging in length from 900mm to 4,000mm.

Goods not covered by this application include T-bar, flat bar, perforated bar (e.g. Rendabar), and hot rolled sections; goods made from hot rolled coil steel that are subsequently subject to a further hot rolling process.

Tariff classification (Schedule 3 of the Customs Tariff Act 1995)

<i>Tariff code</i>	<i>Statistical code</i>	<i>Unit</i>	<i>Description</i>	<i>Duty rate</i>
7216.61.00	57	Tonne	<u>Tariff Code</u> Angles, shapes and sections, not further worked than cold-formed or cold-finished <u>Statistical code</u> Obtained from flat-rolled products	5% DCS: Free
7308.90.00	64	Tonne	<u>Tariff Code</u> Structures (excluding prefabricated buildings of 9406) and parts of structures (for example, bridges and bridge-sections, lock-gates, towers, lattice masts, roofs, roofing frameworks, doors and windows and their frames and thresholds for doors, shutters, balustrades, pillars and columns), of iron or steel; plates, rods, angles, shapes, sections, tubes and the like, prepared for use in structures, of iron or steel – Other . <u>Statistical Code</u> Lintels, prepared for use with doors and windows	5% DCS:4% DCT:5%

7308.30.00	07	Tonne	<u>Tariff Code</u> Structures (excluding prefabricated buildings of 9406) and parts of structures (for example, bridges and bridge-sections, lock-gates, towers, lattice masts, roofs, roofing frameworks, doors and windows and their frames and thresholds for doors, shutters, balustrades, pillars and columns), of iron or steel; plates, rods, angles, shapes, sections, tubes and the like, prepared for use in structures, of iron or steel – Doors, windows and their frames and thresholds for doors. <u>Statistical code</u> Other	5% DCS:4% DCT:5%
7228.70.00	12	Tonne	<u>Tariff Code</u> Other bars and rods of other alloy steel: angles; shapes and sections, of other alloy steel; hollow drill bars and rods of alloy or non-alloy steel – Angles, shapes and sections. <u>Statistical code</u> Other	5% DCS:4% DCT:5%
Previous investigations				
There have been no previous investigations by the Commission in relation to solid base angle.				

Table 3: Goods the subject of the application

2.4 Like goods and the Australian industry

2.4.1 Finding

The Commission is satisfied that there is an Australian industry producing like goods to the goods the subject of the application on the basis that:

- Galintel produces goods that are identical in all respects or have characteristics that closely resemble the goods the subject of the application; and
- the goods are wholly or partly manufactured in Australia.

2.4.2 Legislative framework

Subsection 269TC(1) requires that the Commissioner reject an application for a dumping duty notice if, among other things, the Commissioner is not satisfied that there is, or is likely to be established, an Australian industry in respect of like goods.

Like goods are defined under subsection 269T(1). Subsections 269T(1), 269T(2), 269T(3), 269T(4) and 269T(4A) are used to determine whether the like goods are produced in Australia and whether there is an Australian industry.

2.4.3 Locally produced like goods

Table 4 below summarises the Commission's assessment of whether the locally produced goods are identical to, or closely resemble, the goods the subject of the application and are therefore like goods. This assessment is based on the

information provided by Galintel in its application and an onsite visit by Commission staff to Galintel's manufacturing facility in Coffs Harbour, New South Wales (NSW).

Galintel advised in its application that it manufactures solid base angle, galvanised, in accordance with Australia and New Zealand Standard *AS/NZ 4680:2006*, with an R3 durability rating in accordance with *AS/NZ 2699:2002*, and load tested in accordance with *AS/NZ 1170:2002*. It further advised that its locally manufactured solid base angle is supplied in the following dimensions:

- 100mm x 100mm x 6mm in lengths ranging from 0.9 m to 2.7 m; and
- 150mm x 100mm x 6mm in lengths ranging from 1.8 m to 4.0 m.

Factor	The Applicant's claims	The Commission's assessment
Physical likeness	The goods made by Galintel possess the same physical dimensions as the imported goods (i.e. solid base angle measuring 100mm x 100mm x 6mm, or 150mm x 100mm x 6mm, in varying lengths), have the same physical appearance as the imported goods and are of similar weight and strength.	<p>The application includes an extract from what the applicant claims is an importer publication.⁴ The Commission observes that the goods described in the extract are similar in specification to the locally manufactured goods.</p> <p>The Commission is satisfied that:</p> <ul style="list-style-type: none"> • the goods the subject of the application and the goods produced by Galintel are physically alike in all practical aspects; • the locally produced goods and the imported goods meet the requirements of the same Australian standards; • the imported goods and the locally produced goods are alike in appearance and supplied in similar dimensions and appear to be of similar strength. <p>The Commission is satisfied that Galintel's claims regarding the physical likeness between the locally produced goods and the imported goods are reasonable.</p>

⁴ At section A-3 of the application

Factor	The Applicant's claims	The Commission's assessment
Commercial likeness	<p>The domestically manufactured goods are sold via the same or similar distribution channels, to the same or similar customers on the Australian market, and therefore compete directly with the imported goods.</p> <p>The locally produced and imported goods compete primarily in the east coast markets of NSW, Victoria and Queensland. The market may be segmented as follows:</p> <ul style="list-style-type: none"> • large building market i.e. the big project buildings, supplied through large resellers; • small building market i.e. small builders/ owner builders, home improvement contractors, supplied through distributors to smaller resellers such as hardware stores. <p>In the large building market, the large resellers typically bid for supply contracts at fixed pricing over a period of time, typically 12 months. The large builders are very price sensitive and will switch resellers for better pricing. In the smaller building market, factors such as lead-time, stock availability, supplier location are important, though price is also an important element.</p> <p>The distribution channels are the same for the imported goods and the locally produced goods.</p>	<p>The information provided by the applicant indicates that:</p> <ul style="list-style-type: none"> • close price competition exists in the Australian market between the imported goods and the Australian produced goods, and • participants (particularly in the large building market) are willing to switch between the locally produced goods and the imported goods based on price. <p>The Commission is therefore satisfied of the reasonableness of the applicant's claims in relation to the commercial likeness between the goods the subject of the application and the locally produced goods.</p>
Functional likeness	<p>Both the Australian and imported goods have comparable or identical end-uses in the building and construction industry.</p> <p>The locally produced and imported goods are sold and used in the residential housing market to support brickwork over window, door and garage openings.</p> <p>The solid base angle is primarily used in single and double story residential construction.</p>	<p>The Commission is satisfied that the imported good and the locally produced goods are functionally substitutable.</p> <p>The Commission is satisfied of the reasonableness of Galintel's claims regarding the functional likeness between the goods the subject of the application and the locally produced goods.</p>

Factor	The Applicant's claims	The Commission's assessment
Production likeness	The goods manufactured by Australian industry are manufactured in a similar manner to the imported goods, using the same or similar raw materials to the imported goods. Galintel's production process is described at section 2.4.4 below.	Based on available information, the Commission is satisfied of the reasonableness of Galintel's claims in relation to the production likeness between the locally manufactured goods and the imported goods.
Commission's assessment		
Based on the above assessment, the Commission is satisfied that Australian made solid base angle is "like" to the imported goods.		

Table 4 Like goods assessment

2.4.4 Manufacture in Australia

Table 5 below summarises the Commission's assessment of whether at least one substantial process of manufacture of the like goods is carried out in Australia and whether the like goods are therefore considered to have been manufactured in Australia.

The Applicant's claims
<p>Galintel stated that it manufactures solid base angle from Australian steel manufactured locally in Australia - hot rolled coil (HRC) is sourced locally (supplied by BlueScope Steel Limited), as is zinc used in galvanising (supplied by Sun Metals in Queensland). It summarised its manufacturing process as follows:</p> <ul style="list-style-type: none"> - Receipt of steel coils from local manufacturer; - Uncoil and form through rollform machine; - Stack black bundled lintels into various sized packs; - Goods pass to pickling/pre-treatment process; - Goods placed onto trestles for drainage prior to loading onto jig; - Lintels loaded onto jigs; - Pickler moves loaded jigs into pre-flux prior to galvanising; - Jig is picked up by galvaniser and lintels are galvanised in kettle for required time to achieve specification; - Lintels are then quenched post galvanising; - Finished goods are subject to quality assurance and then bundled into designated packs for despatch to own and customer warehouses. <p>Galintel provided a detailed production schematic for solid base angle at Confidential Attachment A-3.6 to its application.</p>
The Commission's assessment
<p>The Manual explains the concept of "a substantial process of manufacture".⁵ To be substantial, a process must add some essential or vital quality or character to the finished product of like goods.</p> <p>The applicant has described its manufacture of solid base angle using locally sourced HRC and zinc.</p> <p>The Commission inspected Galintel's solid base angle manufacturing facility at Coffs Harbour and observed the manufacturing processes undertaken by the applicant. Based on its observations, the Commission is satisfied that at least one substantial process of manufacture in the production of like goods is performed by the applicant in Australia and therefore the goods may be taken to have been produced in Australia.</p>

Table 5 Manufacturing in Australia

⁵ Chapter 1, Manual.

2.5 Australian industry information

The table below summarises the Commission's assessment of whether Galintel has provided sufficient information in the application to analyse the performance of the Australian industry.

Have the relevant appendices to the application been completed?		
A1	Australian production	Yes
A2	Australian market	Yes
A3	Sales turnover	Yes
A4	Domestic sales	Yes
A5	Sales of other production	Not applicable
A6.1	Cost to make and sell (& profit) – Domestic sales	Yes
A6.2	Cost to make and sell (& profit) – Export sales	Not applicable
A7	Other injury factors	Yes
General administration and accounting information		
Ownership	Galintel is ultimately owned by Nepean Building and Infrastructure (via Ronald E Graham (Holdings) Pty Ltd). Non-Confidential Attachment A2.3 to the application is a copy of Galintel's current company extract with the Australian Securities and Investment Commission.	
Operations	<p>Galintel is a manufacturer of steel lintels. It manufactures solid base angles, flats and T-bars as well as a proprietary range of lintels namely Cavi-T-Bar™, J-Bar™ and Rendabar® Angle.</p> <p>In addition to its lintel manufacturing facility at Coffs Harbour NSW, Galintel operates a hot rolling mill at Yagoona, NSW that supports downstream manufacturing activities at Coffs Harbour by transforming coil steel into multi-rib sections. The rolling mill also undertakes toll slitting of hot rolled coil.</p>	
Financial year	Galintel's financial reporting period is 1 July to 30 June.	
Audited accounts	Galintel provided consolidated audited financial statements for Nepean Building and Infrastructure and its controlled entities for the 2015/2016, 2016/17 and 2017/18 financial years.	
Profit and loss statements	Galintel provided copies of its internal reports representing its business activities for December 2017, March 2018, June 2018 and September 2018 i.e. covering its proposed investigation period. The Commission will conduct further inquiries throughout the investigation in relation to the financial records that are considered relevant to the application.	
Production and sales information		Other injury factors
Galintel has provided detailed production and sales information for the period 1 October 2017 to 30 September 2018.		Galintel has provided data in relation to other injury factors for the period 1 October 2017 to 30 September 2018.
Cost to make and sell information		
Galintel has provided detailed cost to make and sell (CTMS) information for the period 1 October 2017 to 30 September 2018.		

The Commission's assessment

Based on the information in the application, the Commission is satisfied that there is sufficient data on which to analyse the performance of the Australian industry for the purposes of this report. The analysis in chapters 3, 4 and 5 have relied on the data submitted in the application.

As noted at section 1.2 of this report, the injury analysis period for this report will be from 1 January 2015 and the investigation period will be 1 January 2018 to 31 December 2018. The Commission will require Galintel to provide data for the most recent quarter, 1 October 2018 to 31 December 2018, and will use the contemporary data in its analysis for the purposes of this investigation.

Table 6- Sufficiency of Galintel's application data

2.5.1 Australian market for solid base angle

Galintel states that the Australian market for solid base angle is primarily in NSW, Victoria and Queensland (and to a lesser extent in South Australia, Northern Territory and Tasmania).

The information provided by Galintel suggests that the choice of solid base angles over alternatives like traditional angles (made from merchant bar) and T-bars (made from coil plate) will depend on the location and type of dwelling. For instance, residential housing close to the coast will typically require a galvanised product. In certain states like Western Australia, solid base angles are not used at all.

In its application Galintel provided a representation of its distribution channels for solid base angles (**Non-Confidential Attachment A4.2** to the application refers). Its sales are through the following channels:

- distributors who stock the product and sell to resellers;
- resellers who sell direct to the end user, in this case typically builders. In many cases the resellers would have large contracts with residential builders; and
- hardware stores which sell to small end-user builders.

Galintel claims that for the larger building customers, competition is based on price as residential builders will look to maximise margins through reducing construction costs. For the smaller customers particularly hardware stores, a key factor is product availability.

Galintel claims that the market is subject to only minor seasonal fluctuation associated with the holiday period at the end of the year and again at Easter and extended periods of wet weather.

2.5.2 Market size

In its application, Galintel estimated the size of the Australian market for solid base angle during its proposed injury analysis period. It relied on purchased export data from January 2015 to March 2018 for its estimate of the allegedly dumped goods sourced from China and relied on its own market intelligence based on dwelling unit commencements (housing starts) data to form its estimate of the overall size of the Australian market. In arriving at its estimate of the total market size, Galintel assumed that each house constructed during its proposed injury analysis period would have used a certain number of solid base angles.

The Commission has examined the data provided by Galintel and considers that it is a reasonable estimate based on the limited information that is available to the applicant. However the Commission notes that the data that the applicant relies on contains only one of the tariff codes included in the application. In addition the applicant assumes that only products exported by a single identified entity are the goods the subject of this application.

The Commission has compared the information provided by the applicant to information from the Australian Border Force (ABF) import database and due to the limitations in the data used by the applicant (as identified above), has based its estimate of the total size of the market for solid base angle on the ABF data.

The Commission's estimate of import volumes of solid base angles using the ABF import database is based on the following methodology:

- data was extracted from the ABF import data base based on relevant tariff classifications and statistical codes;
- the data was filtered based on the goods description to exclude import transactions that appeared not to be the goods under consideration; and
- to exclude outlying data, the data was filtered to exclude line items where the FOB price per tonne was outside a price range considered reasonable for solid base angles (based on the applicant's prices).

The Commission notes that the ABF data includes a number of consignments under the relevant tariff classifications which were not the goods and a number of consignments for which the goods description in the import declaration is inconclusive. Nonetheless, at this stage the Commission considers that the ABF is the best available data on which an estimate of the size of the Australian market for solid base angle can be based.

The market size based on the resulting data for imported goods and sales by Galintel is depicted at Figure 1 below. The Commission's analysis of the Australian market size for solid base angle is contained in **Confidential Appendix 1**.

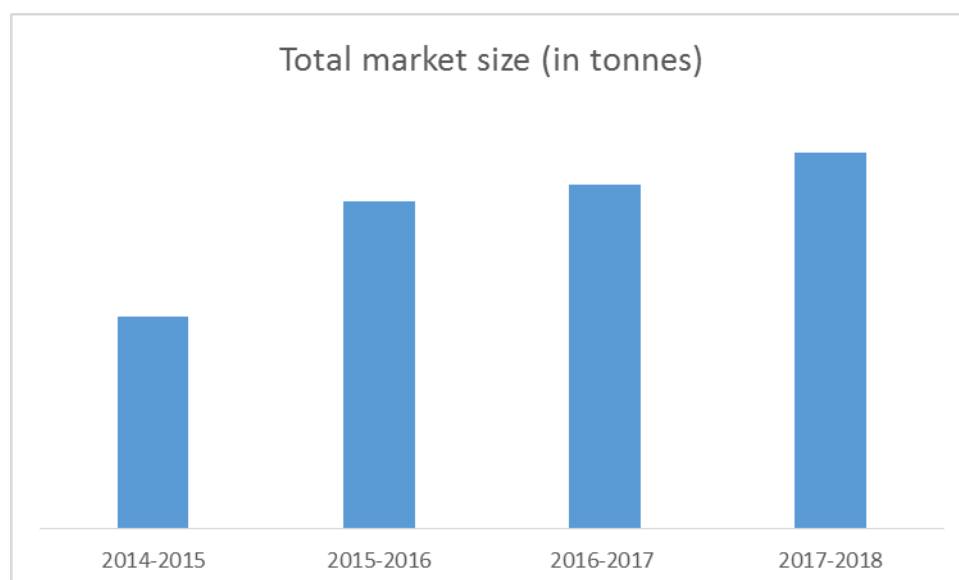


Figure 1: Size of the Australian market for solid base angle

Note: Throughout this report, a reference to a year is a reference to the period from 1 October of that year to 30 September of the following year. For example a reference to 2014 or 2014-2015 is a reference to the period from 1 October 2014 to 30 September 2015.

The Commission estimates that the Australian market for solid base angle was approximately 9000 (nine thousand) tonnes during the period 1 October 2017 to 30 September 2018. The Commission notes that the Australian market for solid base angles has increased in size each year from 2014.

As noted at section 1.2 of this report, the injury analysis period for this report will be from 1 January 2015 and the investigation period will be 1 January 2018 to 31 December 2018. The Commission recommends that Galintel be required to provide data for the most recent quarter, 1 October 2018 to 31 December 2018 and will use the contemporary data and verified data from importers and exporters in its estimate of the Australian market size.

The Commission anticipates that a more reliable estimate of the size of the market will therefore be made during the course of this investigation.

3 Reasonable Grounds – dumping

3.1 Findings

Pursuant to subsection 269TC(1)(c), the Commission considers that there appear to be reasonable grounds to support the claims made by Galintel that:

- the goods have been exported to Australia from China at dumped prices;
- the estimated dumping margin for exports from China is greater than 2% and therefore is not negligible, and
- the estimated volume of goods from China that appear to have been dumped is greater than 3% of the total Australian import volume of goods and therefore is not negligible.

The Commission's volume analysis is at **Confidential Appendix 1**.

The Commission's dumping assessment is at **Confidential Appendix 2**.

3.2 Legislative framework

Subsection 269TC(1) requires that the Commissioner reject an application for a dumping duty notice if, among other things, the Commissioner is not satisfied that there appear to be reasonable grounds for the publication of a dumping duty notice.

Under section 269TG, one of the matters that the Minister must be satisfied of in order to publish a dumping duty notice is that the export price of goods that have been exported to Australia is less than the normal value of those goods, i.e. that dumping has taken place (to an extent that is not negligible). This issue is considered in the following sections.

3.3 Export price

3.3.1 Legislative framework

Export price is determined by applying the requirements in section 269TAB taking into account whether the purchase or sale of goods was an arms' length transaction under section 269TAA.

3.3.2 The Applicant's estimate

The table below summarises the approach taken by the applicant to estimate export prices and the evidence that it relied upon.

Country	Basis of estimate	Details
China	The price paid or payable by the importer to the exporter in arms length transactions - subsection 269TAB(1)(a).	<p>Galintel claims that it is not able to identify imports of solid base angle in Australian Bureau of Statistics (“ABS”) published data as there are non-goods included under the relevant tariff classification.</p> <p>Instead relying on data purchased from a commercial third party source, the applicant estimated Free on Board (FOB) export prices and quantities of solid base angle exported to Australia from China by a Chinese trader of the goods - Yongkang Vincent Import and Export Company (Yongkang Vincent). The applicant states that Yongkang Vincent supplies its competitor in the Australian market for solid base angle.</p> <p>The applicant states that following the imposition of trade sanctions imposed on China by the United States of America, the Chinese authorities have ceased publishing certain trade data and hence relevant data is only available until February 2018. The applicant used the available data to estimate export volumes and export prices for its proposed investigation period. The published data is for FOB prices of the goods exported from China.</p> <p>The applicant submits that the trading company, exporter and the Australian importer are related parties and this relationship may affect the arms-length nature of the export price. However the published data is reliable for the purposes of establishing prima facie dumping margins.</p>

Table 7 – Methodology for estimating export prices used by the applicant.

3.3.3 The Commission's assessment

The Commission examined the export price calculations and supporting evidence provided by Galintel.

The Commission considers that the applicant’s approach to estimating export prices is reasonable based on the information that is available to it. However, as noted at section 2.5.2 of this report there are limitations in that information. The import statistics that the applicant relies on contain only one of the tariff codes included in the application. The applicant has based its estimated export price on exports under that tariff code by a single identified entity.

Due to these limitations, the Commission considers the ABF import data to be more reliable than the applicant’s estimates and has therefore relied on that data to preliminarily determine export volumes and an export price to assess the level of dumping which is discussed at section 3.5 of this report.

Galintel’s calculation of an export price is at **Confidential Appendix 3**.

The Commission’s calculation of an export price and import volumes is at **Confidential Appendix 2**.

3.4 Normal value

3.4.1 Legislative framework

Normal value is determined by applying the requirements in section 269TAC taking into account whether:

- the purchase or sale of the goods was an arms length transaction under section 269TAA;
- the goods were sold in the ordinary course of trade under section 269TAAD;
- there has been an absence or low volume of sales of like goods in the country of export; and
- whether the situation in the market of the country of export is such that sales in that country are not suitable for determining normal value under subsection 269TAC(1).

3.4.2 The Applicant's estimate

The table below summarises the approach taken by the applicant to estimate normal values and the evidence that it relied upon.

Country	Basis of estimate	Details
China	Galintel has constructed the normal value of solid base angle exported to Australia from China in accordance with subsection 269TAC(2)(c).	<p>Galintel claims that it does not have access to information regarding domestic selling prices or production costs for solid base angle in China and there is no relevant published data available.</p> <p>Galintel claims that that normal value of the goods sold in China cannot be determined under subsection 269TAC(1). This is because a particular market situation exists for solid base angle in China as the domestic selling prices for solid base angle is artificially low due to Government of China (GOC) influence on HRC prices. It claims that HRC is a key input that accounts for more than 50 per cent of the production cost of solid base angle.</p> <p>Galintel relied on data from a subscription service to compare the selling prices of HRC from China, Japan, Korea and Taiwan and concluded that Chinese HRC prices were on an average 17.8 percent below the HRC prices in Japan, Korea and Taiwan. It concluded that this contrast in prices confirms that Chinese domestic selling prices for HRC are artificially low.</p> <p>To construct normal values under subsection 269TAC(2)(c), Galintel:</p> <ul style="list-style-type: none"> • used the average domestic selling prices for HRC sold in Japan, Korea and Taiwan during the period 1 July 2017 to September 2018 (using data from MEPS International Ltd);⁶ • relied on its own selling, general and administrative (SG&A) costs; and • applied what it considers a reasonable level of profit, that is the profit it had achieved in the preceding 12 month period from 1 October 2016 to 30 September 2017. <p>Galintel acknowledges that its constructed normal values are at the ex-factory level and thus adjustments to normal value are required for the inland freight component and port loading and handling fees but states that it does not have information on the amounts for these adjustments.</p>

Table 8: Methodology for estimating normal values used by applicant

3.4.3 The Commission's assessment

Market situation claims

Galintel claims that a particular market situation exists for solid base angle in China as the domestic selling prices for solid base angle is artificially low due to GOC influence on HRC prices. Galintel relies on previous investigations by the

⁶ MEPS International Ltd is an independent steel industry analyst providing steel price data.

Commission into commodities exported from China where HRC is a key input. It claims that the Commission's analysis of the Chinese steel industry has established that the GOC plays a significant influencing role in the industry and this has impacted selling prices for steel products, including HRC.⁷ It also refers to the Commission's findings in Statement of Essential Facts (SEF) 441 that the GOC influences in the Chinese steel industry have created a market situation in the Chinese steel pallet racking market, such that sales of steel pallet racking are not suitable for determining normal value under subsection 269TAC(1).⁸ The applicant notes that as is the case with steel pallet racking, HRC represents a substantial portion of the total production cost for solid base angle.

Framework for assessing market situation claims

Subsection 269TAC(2)(a)(ii) provides for circumstances where the normal value of goods cannot be ascertained under subsection 269TAC(1) "because the situation in the market of the country of export is such that sales in that market are not suitable for use in determining a price".⁵ If there is a market situation, normal values may instead be constructed in accordance with subsection 269TAC(2)(c) or determined by reference to prices from a third country pursuant to subsection 269TAC(2)(d).

The Act does not prescribe what is required to reach a finding of market situation, however it is clear that a market situation will arise when there is some factor or factors impacting the relevant market in the country of export generally with the effect that sales in that market are not suitable for use in determining normal value.

Commission's assessment of the applicant's market situation claims

The Commission has found in previous investigations that the cost of HRC as an input in the production of certain steel products did not reasonably reflect competitive market costs (within the meaning of subsection 43(2) of the *Customs (International Obligations) Regulation 2015*) due to GOC influence.⁹ In those cases the Commission replaced the HRC costs in constructing normal values.

The Commission considers that there is a reasonable basis for Galintel to claim that a market situation exists for solid base angle in China based on GOC influenced distortions in the Chinese HRC market. The Commission notes that Galintel's application outlines certain facts, cites relevant information in support of its claims and draws reasonable conclusions as to how these factors may have affected Chinese domestic selling prices of solid base angle.¹⁰

⁷ The applications cites the following previous investigations by the Commission - Investigation No. 177 (Hollow Structural Sections), Investigation No. 190 (Galvanised and Aluminium Zinc Coated Steel), Investigation No. 203 (Hollow Structural Sections), Continuation Enquiry No. 379 (Hollow Structural Sections), Reviews No. 456 & 457 Aluminium and Galvanised Zinc Coated Steel.

⁸ Document Number 75, Electronic Public Record (EPR) 441.

⁹ See for instance Final Report (REP) 456 (Document 18, EPR 456), REP 457 (Document 30, EPR 457), REP 379 (Document 70, EPR 379), REP 203 (Document 13, EPR 203), REP 190 (Document 142, EPR 190) and REP 177 (Document 416, EPR 177) The Commission notes that the findings in SEF 441 are at this stage preliminary findings.

¹⁰ Section B-3 of the application, pages 34 to 37.

During the course of the investigation, the Commission will seek relevant information from Chinese exporters and the GOC in order to independently assess the applicant's market situation claims.

Commission's assessment of normal value

In light of the Commission's preliminary assessment of a market situation, the Commission considers that it is reasonable for Galintel to have calculated constructed normal values. The Commission has examined the normal value calculations and supporting evidence provided by Galintel and makes the following observations:

Cost of production

- Galintel has constructed normal values by using the quarterly average domestic selling price for HRC sold in Japan, Korea and Taiwan during the period 1 October 2017 to 30 September 2018. The Commission notes that Japan, Korea and Taiwan are countries for which relevant data can be obtained via subscription services and in which broadly similar conditions of competition exist; these countries have also been used by the Commission in past cases as an analogue for competitive market costs in China. The Commission therefore considers that Galintel's use of benchmarked HRC prices based on selling prices in Japan, Korea and Taiwan is reasonable.
- Given the absence of information in relation to the manufacturing costs of solid base angle in China, it is reasonable for Galintel to have used its own variable and fixed manufacturing costs.
- The Commission notes that Galintel's estimated normal value does not account for a difference in labour costs for goods produced in China. The Commission tested the effect that lower labour costs may have on Galintel's dumping margin calculations by removing variable manufacturing costs from Galintel's constructed normal value calculation altogether. The Commission notes that this resulted in a dumping margin of 17.32% which is significantly higher than a negligible dumping margin (2%).

SG&A and profit

- The Commission considers that in the absence of reliable information on which to base its estimate of SG&A expenses and profit, for the purposes of calculating normal values it is reasonable for Galintel to rely on its own SG&A costs and the level of profit that it achieved in the most recent 12-month period.

Adjustments

- Galintel did not make adjustments to normal values for items such as inland transport or credit terms. Such an adjustment would have the effect of increasing normal values and the dumping margin. The approach taken by Galintel is therefore considered to be conservative.
- Galintel did not make any adjustments to normal values for value added tax (VAT). The Commission notes that there is no readily available information regarding applicable VAT rebates for export and domestic sales of solid base angles that the applicant could rely on. The VAT adjustment could potentially also have the effect of increasing normal values. The approach taken by Galintel is therefore considered to be reasonable.

The Commission made minor changes to the normal value calculations provided by the applicant to more accurately reflect data provided by the applicant in its Confidential Appendix 6.1.

The Commission's estimate of normal values is at **Confidential Appendix 2**.

Galintel's calculation of normal values is at **Confidential Appendix 3**.

3.5 Dumping margins

3.5.1 Legislative framework

Dumping margins are determined in accordance with the requirements of section 269TACB.

Dumping margins and dumping volumes cannot be negligible, otherwise the investigation is terminated. Whether the dumping margins and dumping volumes are negligible is assessed under section 269TDA.

3.5.2 The applicant's estimate

Galintel estimated quarterly dumping margins for solid base angle exported from China are as follows:

Period	Dumping Margin as % of Export price
Oct – Dec 2017	44.15 to 57.79%
Jan – Mar 2018	31.72 to 47.62%
Apr – Jun 2018	31.72 to 47.62%
Jul – Sep 2018	31.72 to 47.62%

Table 9: Applicant's estimated dumping margins¹¹

3.5.3 The Commission's estimate

As noted above Galintel has used its own conversion costs in constructing normal values. There is no readily available information that the Commission can draw on for the relevant period in order to make any adjustments for a difference in conversion costs.

Notwithstanding its preliminary finding that Galintel's approach to replacing HRC costs with benchmarked data is reasonable, the Commission has therefore adopted a conservative approach and used data for Chinese domestic HRC prices published by S&P Global Platts (rather than the benchmarked HRC prices used by the applicant) to re-calculate quarterly normal values. The Commission considers that this approach mitigates some of the identified shortcomings in the data used by the applicant to construct normal values.

As noted at section 3.3 of this report, due to limitations in the data used by the applicant to estimate import volumes and export prices, the Commission considers the ABF import data to be more reliable than the applicant's estimates and has therefore relied on that data to preliminarily determine import volumes and an export price

The Commission's estimate of the dumping margin for solid base angle exported from China during the period 1 October 2017 to 30 September 2018 is **34.38%**

The Commission's assessment of dumping is contained in **Confidential Appendix 2**.

The Commission's analysis of ABF data indicates that the import volumes from China under the relevant tariff classification codes are in excess of 90 percent of

¹¹ Table B6.1 in the application.

overall imports (from all countries). The Commission therefore considers that import volumes of solid base angle from China are not negligible in terms of subsection 269TDA(4).

4 Reasonable grounds – injury to the Australian industry

4.1 Findings

Pursuant to subsection 269TC(1)(c), having regard to the matters contained in the application, and to other information considered relevant, the Commission considers that there appear to be reasonable grounds to support claims that the Australian industry has experienced injury in the form of:

- reduced market share;
- price suppression;
- loss of profits; and
- reduced profitability.

4.2 Legislative framework

Under section 269TG of the Act, one of the matters that the Minister must be satisfied of in order to publish a dumping duty notice is that the Australian industry has experienced material injury. This issue is considered in the following sections.

4.3 The Applicant's claims

Galintel claims that it has been injured through:

- loss of sales volumes;
- price suppression;
- reduced profit and profitability;
- reduced return on investment;
- reduced attractiveness to reinvest; and
- increased inventory levels

Galintel claims that injury from dumping commenced in 2015.

4.4 Approach to injury analysis

4.4.1 Legislative framework

The matters that may be considered in determining whether the industry has suffered material injury are set out in section 269TAE.

4.4.2 The Commission's approach

The Commission has had regard to the application and other information provided by Galintel, and the ABF import database to assess whether the Australian industry has been injured by allegedly dumped imports. The Commission has also had regard to the *Ministerial Direction on Material Injury 2012*.¹²

Size of the dumping margins

Under subsection 269TAE(1)(aa) the Minister may have regard to the size of the dumping margins worked out in respect of the goods exported to Australia.

As set out in section 3.5 of this report, the dumping margin estimated by the Commission is not negligible.

¹² Available on the Commission's [website](#).

Volume of dumped goods

The Commission's analysis of the ABF import database (as referred to in section 3.5) indicates that the volume of dumped goods from China is greater than 3 percent of the total Australian import volume of solid base angle, and therefore this is not a negligible volume.⁹

4.5 Volume effects

Galintel claims that it experienced volume injury in 2015 and further in 2017. It claims that:

- in 2015 Nepean Building and Infrastructure (its parent company) acquired Ingal Building Systems (Ingal), an importer of solid base angle from China, with the objective of displacing imported solid base angles with locally manufactured solid base angles;
- however, immediately prior to this, one of Galintel's largest customers Vincent Buda Company (Vincent Buda) abandoned purchasing solid base angles from Galintel and commenced importing solid base angles from China;
- Galintel lost sales that it would otherwise have made to Vincent Buda to Chinese imports;
- due to the acquisition of Ingal, in 2016 Galintel achieved higher production and sales volumes;
- in 2016 Vespel Pty Ltd (Vespel) a seller of building products entered the market. Vespel sources solid base angles from Vincent Buda and competes with Galintel.
- from 2017, it has been unable to capture sales volume in an expanding market due to price undercutting by dumped Chinese imports of solid base angle.

4.5.1 Sales volume

Galintel provided its quarterly domestic sales and cost to make and sell (CTMS) data for the period from 1 October 2014 to 30 September 2018.

Figure 2 below depicts the trend in Galintel's sales volumes during that period. It indicates that overall Galintel's sales volumes have risen from 2014.

The Commission observes that while Galintel has claimed a loss in sales volumes, it is not claiming declining sales per se. Galintel claims that it achieved higher sales volumes since its acquisition of Ingal due to the displacement of imported solid base angles that were previously imported by Ingal, however it has been unable to claim a larger share of an expanding market due to dumped imports from China.

Figure 2 below is consistent with Galintel's claims.

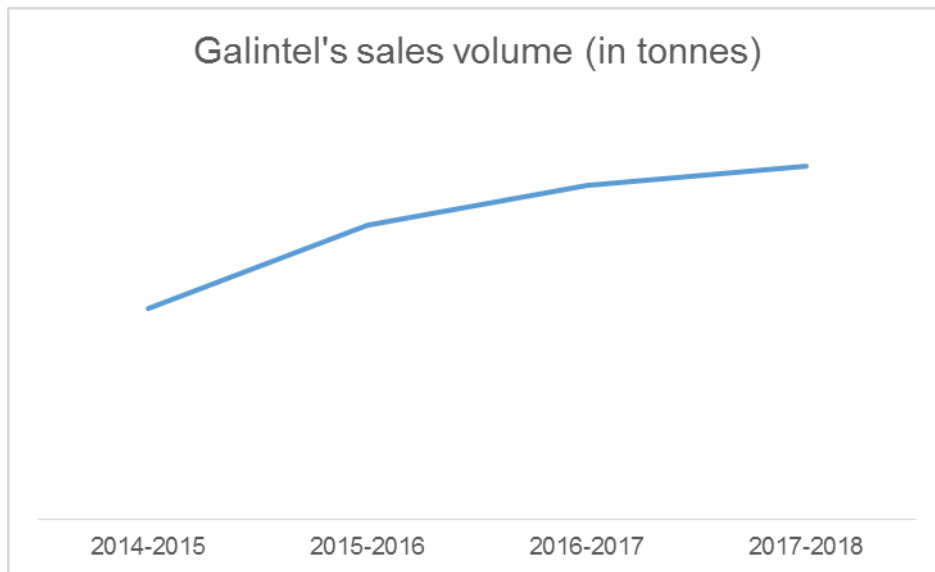


Figure 2: Galintel's sales volume

4.5.2 Market share

As explained at section 2.5 of this report, the Commission assessed the size of the Australian market for solid base angle during the period 1 October 2014 to 30 September 2018, based on the domestic sales data provided by Galintel and ABF import data.

Figure 1 (at section 2.5.1 of this report) indicates that the Australian market for solid base angle has grown in size from 2014. This is consistent with the applicant's claims that the Australian market for solid base angle has expanded since 2014.

Figure 3 below depicts the Australian industry's share of the Australian market during this period.

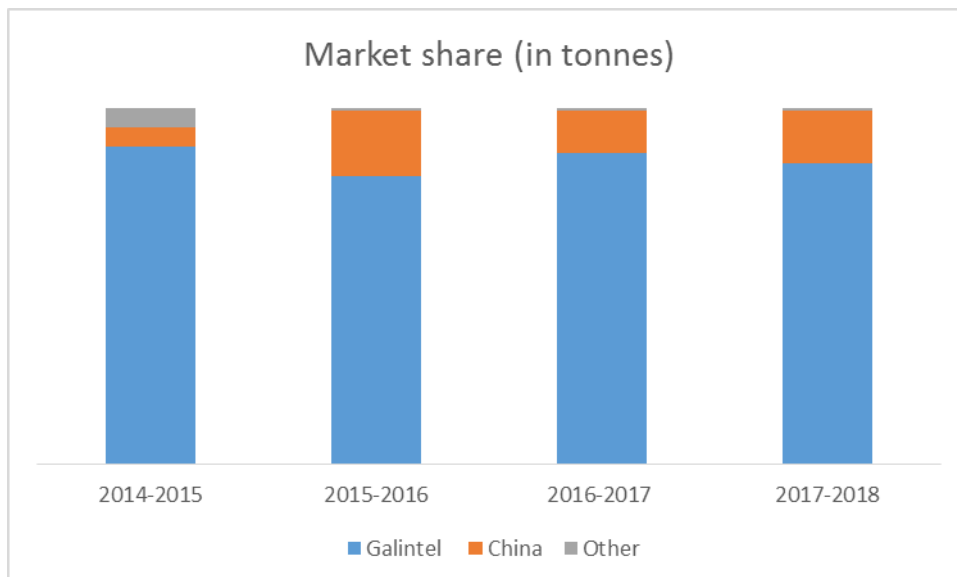


Figure 3: Market share – Australian market for solid base angles

Figure 3 above supports the applicant's claims that it has been unable to gain sales volume in an expanding market. The Commission's analysis indicates that while the Australian market for solid base angle grew in 2017 (as compared to the previous year), Galintel's share of the market declined slightly over the same period with Chinese imports gaining a share of the market to the extent lost by Galintel.

4.5.3 Conclusion – volume effects

Based on the above assessment, the Commission considers that there are reasonable grounds to support Galintel's claim that while it has progressively increased its sales volumes since 2014, it has been unable to capture sales in an expanding market.

4.6 Price effects

Price suppression occurs when price increases, which otherwise would have occurred, have been prevented. An indicator of price suppression may be the margin between prices and costs.

Galintel claims that it has experienced price injury from the dumped imports from late 2015 as Galintel's selling prices were impacted by the selling prices of an importer of the dumped goods. In 2017 Galintel claims it was further injured with the dumped exports undercutting Galintel's prices and preventing Galintel from recovering production cost increases due to HRC and zinc cost increases. Galintel claims that the injury experienced by Galintel is less than it otherwise could have been in the absence of increased rebates provided by Galintel's HRC supplier during 2017.

Figure 4 below depicts the movement in Galintel's unit CTMS and unit price during 1 October 2014 to 30 September 2018.

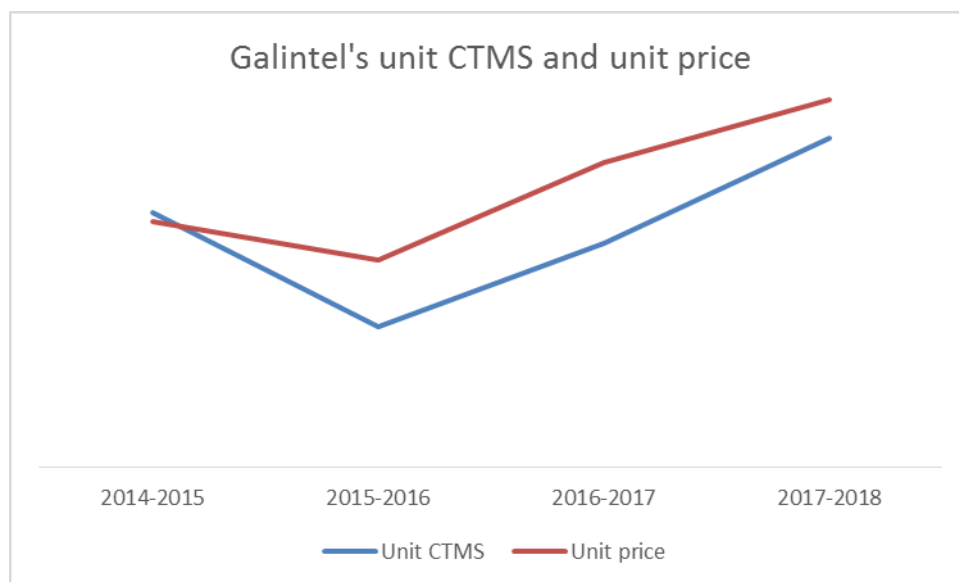


Figure 4: Galintel's unit CTMS and unit price

The above analysis supports Galintel's claims that:

- it was able to reduce costs in 2015 (Galintel attributes the reduced costs to higher production and sales volumes following the acquisition of Ingal); and
- it was able to increase the margin between its unit CTMS and its unit price in 2015 and 2016 (and thus achieve an increase in profit and profitability).

The analysis indicates that in 2017 (as compared to the previous two years), the margin between Galintel's unit CTMS and unit price reduced. The Commission's analysis of price effects is at **Confidential Appendix 4**.

4.6.1 Conclusion – price effects

Based on this assessment, the Commission considers that there are reasonable grounds to support the claim that Galintel has suffered injury in the form of price suppression.

4.7 Profit and profitability effects

Galintel claims that following the acquisition of Ingal in 2015, it was able to reduce costs (via higher production and sales volumes) and was able to achieve modest levels of profit. However from 2017 dumped exports undercut Galintel's prices and prevented it from recovering cost increases, primarily driven by higher raw material prices. Galintel claims that as a consequence of the price undercutting and Galintel's inability to raise prices to fully recover cost increases, Galintel has experienced a reduction in its profit and profitability from the level that it had achieved in 2016.

Figure 5 below depicts Galintel's profits and profitability between October 2014 and September 2018 and indicates that following a recovery in 2015 and 2016 Galintel experienced a deterioration in its profit position in 2017. The Commission's analysis of profits and profitability is at **Confidential Appendix 4**.

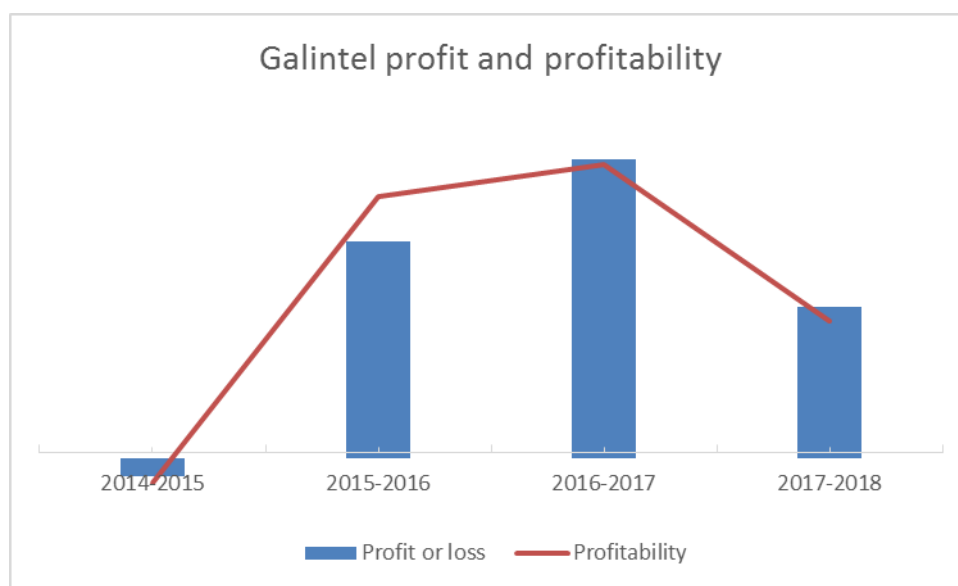


Figure 5: Galintel's profit and profitability

4.7.1 Conclusion – profit and profitability effects

Based on the above analysis, the Commission consider that there are reasonable grounds to support the claims that Galintel has suffered injury in the form of reduced profits and reduced profitability in 2017.

4.8 Other injury factors

Galintel completed Confidential Appendix A7 as part of its application. It claimed injury in the form of a decline in return on investment, reduced employment levels and increased inventory levels. The data provided by Galintel indicated a decline in the return on investment, reduced employment levels and increased inventory levels.

4.8.1 Conclusion – other injury factors

The data provided by Galintel indicates that it experienced a decline in the return on investment, reduced employment levels and increased inventory levels in 2017 (**Confidential Appendix 4 refers**). A further assessment of these (and other factors) as they specifically relate to the goods will be conducted during the course of the investigation.

5 Reasonable grounds – causation factors

5.1 Findings

Having regard to the matters contained in the application, and to other information considered relevant, the Commission considers that there appear to be reasonable grounds to support the claims that the Australian industry has suffered injury caused by dumping, and that the injury is material.

5.2 Cause of injury to the Australian industry

5.2.1 Legislative framework

Under section 269TG of the Customs Act, one of the matters that the Parliamentary Secretary must be satisfied of in order to publish a dumping duty notice is that the material injury suffered by the Australian industry was caused by dumping. This issue is considered in the following sections.

Matters that may be considered in determining whether the Australian industry has suffered material injury caused by dumped or subsidised goods are set out in section 269TAE.

5.3 The Applicant's claims

The table below summarises the causation claims of the applicant

Injury caused by dumping
<p>Galintel claims that it has been impacted by imports of solid base angle from China following the shift by one of its large customers, Vincent Buda, to sourcing from China in 2015.</p> <p>Galintel claims that it lost the sales volumes that it previously supplied to Vincent Buda when Vincent Buda began sourcing solid base angle from China. However in 2015 it also acquired a competitor in the market (Ingal) that sourced from China and it replaced the solid base angle imported by Ingal with its own domestically produced goods. Because of this it was able to increase its sales volume and through higher sales and production volumes, it was able to reduce its costs. In 2015 and 2016, it was able to achieve a level of profitability.</p> <p>In 2016 Vespel, a seller of building products, entered the market. Vespel sourced solid base angle from Vincent Buda and actively sold against Galintel.</p> <p>Galintel claims it has suffered margin reductions across its sales due to Vincent Buda selling dumped imports of solid base angle into the Australian market at a time when HRC prices increased substantially. Galintel claims it has observed in 2017 an increase in the willingness of the importer of dumped solid base angle to approach a broader representation of wholesalers/distributors of lintels to the building industry at prices that undercut Galintel's prices.</p> <p>Galintel has not been able to raise its selling prices to recover cost increases in 2017 and this has adversely affected its profit and profitability in 2017.</p> <p>Galintel has not been able to capture anticipated growth in sales volumes that was expected in 2017 with the increase in housing starts. Galintel's sales volume has been retarded due to price undercutting from dumped Chinese solid base angles.</p>
Injury caused by other factors
<p>Galintel stated that it considers that no other factors contributed to the injury experienced by Galintel.</p>

5.3.1 Volume injury

Galintel's claims in relation to volume injury that it experienced due to the dumped goods are summarised at section 4.5 of this report. Galintel claims that demand in the Australian market for solid base angle is linked to housing starts and building activity. It claims that the market has expanded across the injury period and while it has improved sales volumes due to replacing solid base angle imported by Ingal with its domestically produced goods, it has not captured the anticipated growth in sales volume in 2017. It claims that Vincent Buda supplies dumped solid base angle into the NSW building market specifically targeting large home projects and because of this it has not been able to gain a fair share of the NSW large home building market.¹³

Galintel has stated that the market for solid base angle is driven by new residential housing construction which over the last few years has been buoyant. In support of its claims Galintel provided housing starts statistics published by the Housing Industry Association.

The data supports Galintel's claims that between 2014 and 2018, the residential housing construction sector grew in size. An extract from the housing starts data relied on by Galintel is at **Confidential Appendix 5**.

As demonstrated in Figure 1 of this report, the Commission's analysis supports a preliminary finding that the Australian market for solid base angle has increased in size since 2014. In particular, the Commission's analysis indicates that the market grew by approximately 10 percent in 2017 as compared to 2016. During the same time, as demonstrated in Figure 3 of this report, Galintel's share of the market reduced slightly by approximately 3 percent. The Commission observes that Galintel's decrease in market share during this period corresponds to an increase in market share for Chinese imports during the same period.

In an expanding market, Galintel could reasonably expect an increase in sales consistent with the growth in the market, which has not occurred. The Commission therefore considers that there are reasonable grounds to support Galintel's claims that it has been unable to capture greater sales volume in an expanding market due to the allegedly dumped Chinese imports.

5.3.2 Price injury

Galintel claims that due to the prices of dumped imports of solid base angle it is prevented from recovering production cost increases due to HRC and zinc cost increases.

It claims that its inability to raise selling prices is due to price undercutting by imports of solid base angle sourced from China by Vincent Buda. It claims that the low pricing in the market results in Galintel's customers (resellers in particular) having to match Vincent Buda's prices or lose volume. Galintel is thus unable to pass on cost increases and in some cases has had to reduce its prices to below 2016 levels to retain these customers.

Galintel's application provides examples of its inability to raise prices in relation to specific customers (see case studies 2 and 3 of the application).¹⁴ Galintel also provided email correspondence to supports its claims that the price suppression it

¹³ See also Case Study 4 at section A9.2 of the application.

¹⁴ Section A9.2 of the application.

experienced is due to the prices at which Vincent Buda was supplying solid base angle into the Australian market. **Confidential Appendix 6** is a summary of the information provided by Galintel in support of its claims of price suppression and the Commission's assessment of that information.

Based on the information provided by Galintel, the Commission considers that there are reasonable grounds to support its claims that due to the prices of the allegedly dumped imports, it has been unable to increase its selling prices to reflect cost increases.

5.3.3 Profit and profitability

Based on its findings regarding volume and price injury above at sections 5.3.1 and 5.3.2 of this report, the Commission considers that there are reasonable grounds to support Galintel's claims that the loss of profits and profitability that it experienced in 2017 were caused by the allegedly dumped imports of solid base angle.

5.3.4 Injury caused by factors other than dumping

In its application, Galintel claims that no other factors impacted the Australian industry during the investigation period. The Commission will review the market for solid base angles during the injury period and investigate any other factors that may have impacted the Australian industry producing like goods.

5.3.5 Materiality of the injury

Galintel claims that its unit profit declined by almost 50 percent in 2017 as it experienced price suppression and was unable to pass on higher production costs. It claims the injury that it has experienced threatens its future viability if it is required to compete with unfairly priced imports.

The Commission considers that it is reasonable for Galintel to claim that the injury that it has experienced is material, when considered against Galintel's turnover and the level of profit that it achieved during that period.

5.3.6 Conclusion – material injury caused by dumping

The Commission considers that:

- the level of dumping indicated in the application and the Commission's own calculations; and
- the preliminary assessment of reduced market share, price suppression and reduced profits and profitability

provide reasonable grounds to support a conclusion that exports of the goods from China at dumped prices has caused material injury to the Australian industry.

6 Appendices and attachments

Appendices	Title
Appendix 1	Volume Analysis
Appendix 2	Commission's dumping margin calculations
Appendix 3	Galintel's dumping margin calculations
Appendix 4	Commission' injury analysis
Appendix 5	Housing starts data
Appendix 6	Assessment of price suppression information

Attachments	Confidentiality	Title
Attachment 1	Public	Public notice
Attachment 2	Public	Public version of application with Attachments
Attachment 3	Public	File note of Commission's visit to the applicant's production facility in Coffs Harbour