



Australian Government
Department of Industry, Science,
Energy and Resources

Anti-Dumping Commission

Exporter Questionnaire



Case number: 546

Product: Steel Reinforcing Bar (Rebar)

From: Republic of Korea, Singapore, Spain
(except Nervacero S.A.) & Taiwan
(except Power Steel Co. Ltd)

Investigation period: 1 January 2019 to 31 December 2019
(the period)

Response due by: Thursday 9 April 2020

[Extended to 29 April 2020](#)

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

OR

Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601
Australia

Attention: Director Investigations 2

Fax: +61 3 8539 2499

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

TABLE OF CONTENTS

TABLE OF CONTENTS	2
INSTRUCTIONS	3
CHECKLIST	6
GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES.....	8
SECTION B EXPORT SALES TO AUSTRALIA.....	11
B-1 AUSTRALIAN EXPORT SALES PROCESS	11
B-2 AUSTRALIAN SALES LISTING	12
B-3 SAMPLE EXPORT DOCUMENTS.....	13
B-4 RECONCILIATION OF SALES TO FINANCIAL ACCOUNTS	13
B-5 RECONCILIATION OF DIRECT SELLING EXPENSES TO FINANCIAL ACCOUNTS	14
SECTION C EXPORTED GOODS & LIKE GOODS	15
C-1 MODELS EXPORTED TO AUSTRALIA	15
C-2 MODELS SOLD IN THE DOMESTIC MARKET	16
C-3 INTERNAL PRODUCT CODES	17
SECTION D DOMESTIC SALES	18
D-1 DOMESTIC SALES PROCESS	18
D-2 DOMESTIC SALES LISTING	19
D-3 SAMPLE DOMESTIC SALES DOCUMENTS	20
D-4 RECONCILIATION OF SALES TO FINANCIAL ACCOUNTS	20
SECTION E DUE ALLOWANCE.....	22
E-1 CREDIT EXPENSE	22
E-2 PACKAGING	23
E-3 DELIVERY	23
E-4 OTHER DIRECT SELLING EXPENSES	24
E-5 OTHER ADJUSTMENT CLAIMS	26
SECTION F THIRD COUNTRY SALES	27
F-1 THIRD COUNTRY SALES PROCESS	27
F-2 THIRD COUNTRY SALES LISTING	27
F-3 DIFFERENCES IN SALES TO THIRD COUNTRIES.....	28
SECTION G COST TO MAKE AND SELL.....	29
G-1. PRODUCTION PROCESS	29
G-2. COST ACCOUNTING PRACTICES.....	29
G-3 COST TO MAKE ON DOMESTIC MARKET	32
G-4 SELLING, GENERAL & ADMINISTRATION EXPENSES	33
G-5 COST TO MAKE THE GOODS EXPORTED TO AUSTRALIA	33
G-6 COST ALLOCATION METHODOLOGY.....	34
G-7 MAJOR RAW MATERIAL COSTS.....	34
G-8 RECONCILIATION OF COST TO MAKE TO AUDITED FINANCIAL STATEMENTS	36
G-9 CAPACITY UTILISATION	36
EXPORTER'S DECLARATION	37
APPENDIX GLOSSARY OF TERMS.....	38

INSTRUCTIONS

Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the Commission) is conducting a Continuation Inquiry into Steel Reinforcing Bar exported to Australia from Republic of Korea, Singapore, Spain (except Nervacero S.A.) & Taiwan (except Power Steel Co. Ltd).

The Commission will use the information you provide to determine normal values and export prices over the investigation period being 1 January 2019 to 31 December 2019 (the period). This information will determine whether Steel reinforcing bar is being dumped.

If you do not manufacture the goods

If you play a role in the export of the goods but do not produce or manufacture the goods (for example, you are a trading company, broker, or vendor dealing in the goods), it is important that you forward a copy of this questionnaire to the relevant manufacturers and inform the Commission of the contact details for these manufacturers **immediately**.

The Commission will still require your company to complete this exporter questionnaire except Section G – Cost to make and sell.

What happens if you do not respond to this questionnaire?

You do not have to complete the questionnaire. However, if you do not respond, do not provide all of the information sought, do not provide information within a reasonable time period, or do not allow the Commission to verify the information, we may deem your company to be an uncooperative exporter. In that case the Commission must determine a dumping margin having regard to all relevant information.

Therefore, it is in your interest to provide a complete and accurate response to this exporter questionnaire, capable of verification.

Extension requests

If you require a longer period to complete your response to this exporter questionnaire, you must submit a request to the Commission, in writing, for an extension to the due date for all or part of the questionnaire. This request must be made prior to the due date. A request for extension will be rejected if received after the due date.

When considering the extension request, the Commission will have regard to:

- the Commission's responsibility to conduct the case in a timely and efficient manner;
- the reasons why you could not provide a response within the whole period and not only the period remaining between the request and the due date;
- ordinary business practices or commercial principles;
- the Commission's understanding of the relevant industry;
- previous correspondence and previous dealings with your company; and
- information provided by other interested parties.

More information on extensions can be found in the Customs (Extension of Time and Non-cooperation) Direction 2015 at <https://www.legislation.gov.au/Details/F2015L01736>.

You will be informed of the decision whether your request for an extension has been rejected, granted in full or granted in part. For example, you may be granted an extension to submit all sections except for Section A or you may be granted a shorter extension than you requested.

PUBLIC RECORD

A summary of any requests and grants of extensions to submit a response to this exporter questionnaire will be published in the public record.

Submitting a response to the exporter questionnaire

Responses to the exporter questionnaire should be lodged by email listed on the cover page. In submitting the response to the exporter questionnaire, you must answer all questions, include all attachments and spreadsheets, and provide a non-confidential version of your response to this exporter questionnaire.

If your response to this exporter questionnaire contains major deficiencies that, in the Commissioner's view, cannot be quickly and easily rectified in a further response, then your company may be deemed as an uncooperative exporter.

Confidential and non-confidential responses

You are required to lodge a confidential version (for official use only) and a non-confidential version (for public record) of your response to this exporter questionnaire by the due date. Please ensure that *each page* of information you provide is clearly marked either "FOR OFFICIAL USE ONLY" or "PUBLIC RECORD".

All information provided to the Commission in confidence will be treated accordingly. The public record version of your questionnaire will be placed on the public record, and must contain sufficient detail to allow a reasonable understanding of the substance of the information, but does not breach confidentiality nor adversely affect those interests.

A person is not required to provide a summary for the public record if the Commission can be satisfied that no such summary can be given that would allow a reasonable understanding of the substance of the information.

All questionnaires are required to have a bracketed explanation of deleted or blacked out information for the public record version of the questionnaire. An example of a statement to accompany deleted/blacked out text is:

[Explanation of cost allocation through the divisions, by reference to machine hours or weight].

If such an explanation is not provided, the Commission may disregard the information in the submission. Where the public record version of your response to the exporter questionnaire does not contain sufficient detail, your company may be deemed to have significantly impeded the case and be deemed an uncooperative exporter.

Verification of the information that you supply

The Commission may wish to conduct a visit to your company to verify your questionnaire response for completeness, relevance and accuracy of the information to your company's records.

The verification visit is not meant to be a chance for you to provide new or additional information. The Commission expects your response to the questionnaire to be relevant, complete and accurate.

Any verification visit typically commences approximately 2 to 4 weeks after the due date of the response to the exporter questionnaire. To assist with planning of a verification visit, please contact the Commission as soon as possible for a potential verification date to be scheduled.

Verification is usually conducted over 4 days. However, in complex cases, a verification visit may be scheduled over 5 days. A verification visit will include a detailed examination of your company's records and we will collect copies of relevant documents. The verification will require the participation of key staff, including your financial accountant, production manager and sales staff. A tour of the manufacturing facility may also be required during the verification visit.

Note that the Commission may disregard any data or information that is not verified, including new or additional information provided after the verification visit.

PUBLIC RECORD

A report will be prepared following the verification visit, which details the outcomes of the visit. This report will be placed on the public record and may include the publication of the preliminarily-assessed dumping margin. The Commission considers that the dumping margin is not confidential information, but rather an aggregate figure derived from confidential data.

You will be provided with an opportunity to comment on the accuracy and confidentiality of the verification report prior to its publication on the public record.

The Commission may elect to undertake an alternative verification methodology than an on-site verification to satisfy itself of the completeness, relevance and accuracy of the data.

For information on the Commission's verification procedures, refer to Anti-Dumping Notice No. 2016/30 available on the Commission's website.

Important instructions for preparing your response

- All questions in this exporter questionnaire must be completed. If a question is not applicable to your situation, please answer the question with "Not Applicable" and provide an explanation as to why.
- All questions must be answered in English. An English translation must be provided for documents not originally in English.
- Clearly identify all units of measurement (e.g. KG) and currencies (e.g. AUD) used. Apply the same measurement consistently throughout your response to the questionnaire.
- Label all attachments to your response according to the section of the questionnaire it relates to (e.g. label the chart of accounts as Attachment A-4.6)
- The data must be created as spreadsheet files in Microsoft Excel.
- If you have used formulas to complete spreadsheets, these formulas must be retained and not hard-coded.
- You must retain all worksheets used in answering the questionnaire. Be prepared to provide these worksheets during the Commission's verification of your data.
- If you cannot present electronic data in the requested format contact the case officer as soon as possible.
- Where possible, electronic data should be emailed or shared with the Commission via SIGBOX, a secure online document repository. Please contact the Commission to request access to SIGBOX if required.

PUBLIC RECORD

CHECKLIST

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please tick if you have responded to all questions
Error! Reference source not found.	<input checked="" type="checkbox"/>
Section B Export sales to Australia	<input checked="" type="checkbox"/>
Section C Exported goods & like goods	<input checked="" type="checkbox"/>
Section D Domestic sales	<input checked="" type="checkbox"/>
Section E Due allowance	<input checked="" type="checkbox"/>
Section F Third country sales	<input checked="" type="checkbox"/>
Section G Cost to make and sell	<input checked="" type="checkbox"/>
Exporter's declaration	<input checked="" type="checkbox"/>
Non-confidential version of this response	<input checked="" type="checkbox"/>

Attachments	Please tick if you have provided spreadsheet
B-2 Australian sales	<input checked="" type="checkbox"/>
B-4 Upwards sales	<input checked="" type="checkbox"/>
B-5 Upwards selling expenses	<input checked="" type="checkbox"/>
D-2 Domestic sales	<input checked="" type="checkbox"/>
F-2 Third country sales	<input checked="" type="checkbox"/>
G-3 Domestic CTM	<input checked="" type="checkbox"/>
G-4.1 SG&A listing	<input checked="" type="checkbox"/>
G-4.2 Dom SG&A calculation	<input checked="" type="checkbox"/>
G-5 Australian CTM	<input checked="" type="checkbox"/>

PUBLIC RECORD

G-7.2 Raw material CTM	<input checked="" type="checkbox"/>
G-7.4 Raw material purchases	<input checked="" type="checkbox"/>
G-8 Upwards costs	<input checked="" type="checkbox"/>

GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES

The goods subject to anti-dumping measures (the goods) are:

Hot-rolled deformed steel reinforcing bar whether or not in coil form, commonly identified as rebar or debar, in various diameters up to and including 50 millimetres, containing indentations, ribs, grooves or other deformations produced during the rolling process. The goods include all steel reinforcing bar meeting the above description of the goods regardless of the particular grade or alloy content or coating.

The goods are generally, but not exclusively, classified to the following tariff subheadings of Schedule 3 to the *Customs Tariff Act 1995*:¹

Table 1: Extract from Schedule 3 to the *Customs Tariff Act 1995*

Tariff Subheading	Statistical Code	Description
7213		BARS AND RODS, HOT-ROLLED, IN IRREGULARLY WOUND COILS, OF IRON OR NON-ALLOY STEEL
7213.10.00	42	Containing indentations, ribs, grooves or other deformations produced during the rolling process
7214		OTHER BARS AND RODS OF IRON OR NON- ALLOY STEEL, NOT FURTHER WORKED THAN FORGED, HOT-ROLLED, HOT-DRAWN OR HOT- EXTRUDED, BUT INCLUDING THOSE TWISTED AFTER ROLLING
7214.20.00	47	Containing indentations, ribs, grooves or other deformations produced during the rolling process or twisted after rolling
7227		BARS AND RODS, HOT-ROLLED, IN IRREGULARLY WOUND COILS, OF OTHER ALLOY STEEL
7227.90	Other	
7227.90.10	69	Goods, as follows: a. of high alloy steel; b. "flattened circles" and "modified rectangles" as defined in Note 1(l) to Chapter 72
7227.90.90	01	<i>Containing indentations, ribs, grooves or other deformations produced during the rolling process</i>
	02	<i>Of circular cross-section measuring less than 14 mm in diameter</i>

¹ These tariff classifications and statistical codes may include goods that are both subject and not subject to the anti-dumping measures. The listing of these tariff classifications and statistical codes are for convenience or reference only and do not form part of the goods description. Please refer to the goods description for authoritative detail regarding goods subject to the anti-dumping measures.

PUBLIC RECORD

Tariff Subheading	Statistical Code	Description
	04	<i>Other</i>
7228		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
7228.30		Other bars and rods, not further worked than hot-rolled, hot-drawn or extruded
7228.30.10	70	Goods, as follows: a. of high alloy steel; b. "flattened circles" and "modified rectangles" as defined in Note 1(m) to Chapter 72
7228.30.90	40	<i>Containing indentations, ribs, grooves or other deformations produced during the rolling process</i>
7228.60		Other bars and rods
7228.60.10	72	Goods, as follows: a. of high alloy steel; b. "flattened circles" and "modified rectangles" as defined in Note 1(m) to Chapter 72

The goods subject to the anti-dumping measures do not include:

- plain round bar;
- stainless steel; and
- reinforcing mesh.

Model Control Code

Details of the model control code (MCC) structure for the goods are detailed in the table below. Export sales data (Section B-2), domestic sales data (Section D-2) and cost to make and sell data (Section G-3, G-4 & G-5) submitted in this response must follow this MCC structure. At a minimum, the data must report sales and cost data separately for each of the mandatory MCC categories identified by the Commission.

Table 2: Proposed MCC structure

Item	Category	Sub-category	Identifier	Sales Data	Cost Data
1	Prime	Prime	P	Mandatory	Optional
		Non-Prime	N		
2		Less than or equal to 300	A	Mandatory	Mandatory

PUBLIC RECORD

	Minimum yield strength specified by product standard (Mega Pascals or "MPa")	Greater than 300 but less than or equal to 480	B		
		Greater than 480 but less than 550	C		
		Equal to or greater than 550	D		
3	Finished form	Rebar in length/straight	S	Mandatory	Mandatory
		Rebar in coil	C		
4	Nominal diameter (millimetres or "mm")	Less than 12	A	Mandatory	Optional
		Greater than or equal to 12 and less than or equal to 16	B		
		Greater than 16 and less than or equal to 32	C		
		Greater than 32 and less than or equal to 50	D		
5	Length (metres or "m")	Less than or equal to 6	1	Mandatory	Optional
		Greater than 6 and less than or equal to 12	2		
		Greater than 12	3		
		Coil product	C		
6	Deformation pattern along Length	Threaded	T	Mandatory	Optional
		Non-threaded	N		

In constructing a MCC, use a "-" between each category. For example: P-C-S-B-C-N

The MCCs will be used to model match export models to the identical or comparable domestic models. In addition, the MCCs will be used to determine the profitability of domestic sales in the ordinary course of trade test by comparing domestic selling prices to the corresponding cost to make and sell. The MCC may also be used to compare the export price to the cost to make the exported model as part of the constructed normal value.

If there are models manufactured and sold by your company that do not align within the MCC structure above, this should be raised by lodging a submission with the Commission as soon as is practicable, but no later than the time this questionnaire is due, otherwise the response may be deemed deficient.

SECTION B

EXPORT SALES TO AUSTRALIA

B-1 Australian export sales process

1. Provide details (and diagrams if appropriate) of the export sales process of your company and any entities (e.g. agents) including:

- (a) Marketing and advertising activities
- (b) Price determination and/or negotiation process
- (c) Order placement process
- (d) Order fulfilment process and lead time
- (e) Delivery terms and process
- (f) Invoicing process
- (g) Payment terms and process

During the inquiry period, NatSteel sold rebar to the [CONFIDENTIAL INFORMATION DELETED – Australian customers] following the below procedure:

[CONFIDENTIAL INFORMATION DELETED – detailed explanation of Australian sales process]

2. In what currency do you invoice your customers for goods exported to Australia? If it is not in your local currency:

- (a) Do your customers pay you into a foreign currency denominated account? If yes, provide details;
- (b) Do you use forward contracts to lock in the foreign exchange rate relating to the export sales? If yes, provide details;
- (c) How is the exchange rate determined in your accounting system and how often is it updated?

[CONFIDENTIAL INFORMATION DELETED – currency used Australian sales transactions]

3. Are there any customers of the goods exported to Australia related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.

No Australian customer is related to NatSteel.

4. If sales are in accordance with price lists or price extras list, provide copies of these lists.

PUBLIC RECORD

[CONFIDENTIAL INFORMATION DELETED – NatSteel’s prices setting process]

5. Do your export selling prices vary according to the distribution channel identified? If yes, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

Not applicable. NatSteel does not have multiple distribution channels into the Australian market.

6. Did you provide on-invoice discounts and/or off-invoice rebates to any customer or an associate of the customer in relation to the sale of the goods exported to Australia during the period? If yes, provide a description and explain the terms and conditions that must be met by the customer to obtain the discount.

NatSteel does not generally provide any on-invoice/or off invoice discounts in relation to the sale of the goods to Australia.

[CONFIDENTIAL INFORMATION DELETED – details regarding commercial relationship with Australian customer]

7. Did you issue any credit or debit notes (directly or indirectly) to the customer or associate of the customer in relation to the sale of the goods exported to Australia during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.

[CONFIDENTIAL INFORMATION DELETED – details regarding commercial relationship with Australian customer]

8. The invoice date will normally be taken to be the date of sale. If you are making a claim that a different date should be taken as the date of sale:

NatSteel considers the date of invoice to be the date of sale.

- (a) What date are you claiming as the date of sale?
- (b) Why does this date best reflect the material terms of sale?

B-2 Australian sales listing

- Complete the worksheet named “B-2 Australian sales”
 - This worksheet lists all sales (i.e. transaction by transaction) exported to Australia of the goods invoiced within the period. This includes exports to Australia sold through a domestic customer.
 - If you have claimed in B-1.8 that the date of sale is one other than the invoice date, then add the sales within your claimed date of sale.
 - You must provide this list in electronic format using the template provided.

PUBLIC RECORD

- If you have used formulas to complete this worksheet, these formulas must be retained.
- If there are any direct selling expenses incurred in respect of the exports to Australia not listed in the spreadsheet, add a column. For example, if the delivery terms make you responsible for arrival of the goods at an agreed point within Australia (e.g. delivered duty paid), insert additional columns in the spreadsheet for all other costs incurred.

Please refer to [CONFIDENTIAL] Attachment 12 – Australian Sales.

2. Provide a table listing the source of the data for each column in the “B-2 Australian sales” listing.

Please refer to [CONFIDENTIAL] Attachment 13 – Australian Sales sources.

B-3 Sample export documents

1. Select the two largest invoices by value and provide the following documentation:

- Contracts
- Purchase order and order confirmation
- Commercial invoice and packing list
- Proof of payment and accounts receivable ledger
- Documents showing bank charges
- Invoices for inland transport
- Invoices for port handling and other export charges
- Bill of lading
- Invoices for ocean freight & marine insurance (if applicable)
- Country of origin certificates (if applicable)

If the documents are not in English, please provide a translation of the documents.

2. For each document, please annotate the documents or provide a table reconciling the details in the “B-2 Australian sales” listing to the source documents in B-3.1.

Please refer to [CONFIDENTIAL] Attachments 14 and 15.

B-4 Reconciliation of sales to financial accounts

1. Please complete the worksheet named “B-4 Upwards sales” to demonstrate that the sales listings in B-2, D-2 and F-2 are complete.
 - You must provide this list in electronic format using the template provided.

PUBLIC RECORD

- Please use the currency that your accounts are kept in.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
2. Please provide all documents, other than those in A-4, B-2 and D-2, required to complete the “B-4 Upwards sales” worksheet. If the documents include spreadsheets, all formulas used must be retained.
 3. For any amount in the “B-4 Upwards sales” worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
 - the name of the source document, including the relevant page number, in column D of the worksheet; and
 - highlight or annotate the amount shown in the source document.

Please refer to [CONFIDENTIAL] Attachment 16 – Upward Sales.

B-5 Reconciliation of direct selling expenses to financial accounts

1. Please complete the worksheet named “B-5 Upwards selling expense” to demonstrate that the direct selling expenses (e.g. Inland transport) in B-2 and D-2 are complete.
 - You must provide this list in electronic format using the template provided.
 - Please use the currency that your accounts are kept in.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
2. Please provide all documents, other than those in A-4, B-2 and D-2, required to complete the “B-5 Upwards selling expense” worksheet. If the documents include spreadsheets, all formulas used must be retained.
3. For any amount in the “B-5 Upwards selling expense” worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
 - the name of the source document, including the relevant page number, in column C of the worksheet; and
 - highlight or annotate the amount shown in the source document.

Please refer to [CONFIDENTIAL] Attachment 17 – Upward selling expenses

SECTION C

EXPORTED GOODS & LIKE GOODS

The Commission considers the MCC structure in and of itself is not likely to be commercially sensitive information. Any claim that disclosing the MCC information is confidential or would adversely affect your business or commercial interests must be raised by lodging a submission as soon as practicable, but no later than the time this questionnaire is due.

C-1 Models exported to Australia

1. Fully describe all of the goods your company exported to Australia during the period. Include specification details and any technical and illustrative material that may be helpful in identifying, or classifying, the goods exported to Australia.

NatSteel produces the following products that are considered to be the goods under consideration for the purposes of this investigation:

- rebar straights – 6m, 9m and 12m; and
- rebar in coil – 12 mm and 16 mm diameter

These products are produced as per the AS/NZ 4671 standard 500N grade and are certified to meet the standards required by the Australasian Certification Authority for Reinforcing and Structural Steels (“ACRS”).

In addition to these products, NatSteel produces the following products, which are not the goods under consideration:

- cold reduced wire in cut lengths ,coils;
- reinforcing welded wire mesh;
- trench mesh; and
- cut and bent bars.

Please refer to Attachment 4 – NatSteel brochure for further details.

2. Provide a list of MCCs of the goods exported to Australia. This must cover all MCCs listed in the Australian sales listing in B-2.
 - This list must be disclosed in the public record version of the response.

The MCCs of the goods exported to Australia are:

- P-C-C-A-C-T;
- P-C-C-B-C-T;
- P-C-S-B-1-T;

PUBLIC RECORD

- P-C-S-B-2-T;
- P-C-S-C-2-T; and
- P-C-S-D-2-T.

C-2 Models sold in the domestic market

1. Fully describe all like goods your company sold on the domestic market during the period. Include specification details and any technical and illustrative material that may be helpful in identifying, or classifying, the like goods sold on the domestic market.

Please refer to C-1(1) above. NatSteel produces goods that are identical or that have characteristics closely resembling the goods under consideration, for sale in the domestic market.

[CONFIDENTIAL INFORMATION DELETED – details of pricing implications for different models]

2. Provide a list of MCCs of like goods sold on the domestic market. This must cover all MCCs listed in the domestic sales listing in D-2.
 - This list must be disclosed in the public record version of the response.

- The MCCs of the goods sold domestically are:
- P-C-C-A-C-T;
 - P-C-C-B-C-T;
 - P-C-S-A-1-T;
 - P-C-S-A-2-T;
 - P-C-S-B-2-T;
 - P-C-S-C-2-T;
 - P-C-S-C-3-T;
 - P-C-S-D-2-T;
 - P-C-S-D-3-T;
 - P-D-S-B-2-T;
 - P-D-S-C-2-T;
 - P-D-S-C-3-T;

PUBLIC RECORD

- P-D-S-D-2-T; and
- P-D-S-D-3-T.

C-3 Internal product codes

1. Does your company use product codes or stock keeping unit (SKU) codes?

If yes:

- (a) Provide details of the product or SKU coding system for the goods, such as a legend or key of the meaning for each code within the product or SKU code.

Please refer to [CONFIDENTIAL] Attachment 19 – SKU.

- (b) Provide details on how you mapped the product or SKU codes to the MCC for the purpose of completing this questionnaire.

As the MCC is based on product type (coil or bar) and diameter – both features captured by the SKU - this mapping was relatively simple to complete.

- (c) Provide a table of showing the product or SKU codes for each MCC.

Please refer [CONFIDENTIAL] Attachment 20 – SKU – MCC table.

If no:

- (a) Provide details on the method used to identify the MCC in the sales and cost spreadsheets.

Not applicable.

SECTION D DOMESTIC SALES

D-1 Domestic sales process

1. Provide details (and diagrams if appropriate) of the domestic sales process of your company and any other related entities including:

- (a) Marketing and advertising activities
- (b) Price determination and/or negotiation process
- (c) Order placement process
- (d) Order fulfilment process and lead time
- (e) Delivery terms and process
- (f) Invoicing process
- (g) Payment terms and process

All sales are negotiated with customers taking into account competitive market conditions, costs and sales terms.

Strictly speaking, there are [CONFIDENTIAL INFORMATION DELETED – number] different types of sales entered into:

[CONFIDENTIAL INFORMATION DELETED – details of kinds of domestic sales]

The customer will order products from NatSteel either by email, fax or phone. They will specify their requirements including delivery destination.

[CONFIDENTIAL INFORMATION DELETED – payment terms]

2. Are any domestic customers related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.

No. None of NatSteel's domestic customers are related to NatSteel.

3. If sales are in accordance with price lists or price extras list, provide copies of these lists.

NatSteel's sales are not in accordance with price lists.

4. Do your domestic selling prices vary according to the distribution channel identified? If yes, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

PUBLIC RECORD

Domestic selling prices vary according to the terms and circumstances of individual sales. The factors taken into account include level, volume, price and relationship.

5. Did you provide on-invoice discounts and/or off-invoice rebates to the customer or an associate of the customer in relation to the sale of the like goods during the period? If yes, provide a description; and explain the terms and conditions that must be met by the importer to obtain the discount.

No, NatSteel does not generally provide any discounts, whether on or off the invoice. [CONFIDENTIAL INFORMATION DELETED – details of some contracts]

6. Did you issue any credit or debit notes (directly or indirectly) to the customer or associate of the customer in relation to the sale of the like goods during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.

[CONFIDENTIAL INFORMATION DELETED – details of credit notes]

7. The invoice date will normally be taken to be the date of sale. If you are making a claim that a different date should be taken as the date of sale:

NatSteel considers the date of invoice to be the date of sale.

- (a) What date are you claiming as the date of sale?
- (b) Why does this date best reflects the material terms of sale?

D-2 Domestic sales listing

1. Complete the worksheet named “D-2 Domestic sales”
- This worksheet lists all domestic sales (i.e. transaction by transaction) of like goods invoiced within the period, even if they are models not exported to Australia
 - If you have claimed in B-1.8 and/or D-1.7 that the date of sale is one other than the invoice date, then add the sales within your claimed date of sale.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
 - If there are any other costs, charges or expenses incurred in respect of the sales listed which have not been identified in the table in question D-2 above, add a column for each item. For example, certain other selling expenses incurred.

Please refer to [CONFIDENTIAL] Attachment 21 – Domestic Sales.

2. Provide a table listing the source of the data for each column in the “D-2 domestic sales” listing.

Please refer to [CONFIDENTIAL] Attachment 22 – Domestic Sales data.

D-3 Sample domestic sales documents

1. Select the two largest invoices by value and provide the following documentation:

- Contracts
- Purchase order and order confirmation
- Commercial invoice and packing list
- Proof of payment and accounts receivable ledger
- Documents showing bank charges
- Delivery invoices

If the documents are not in English, please provide a translation of the documents.

2. For each document, please annotate the documents or provide a table reconciling the details in the “D-2 Domestic sales” listing to the source documents in D-3.1.

Please refer to [CONFIDENTIAL] Attachments 23 and 24.

D-4 Reconciliation of sales to financial accounts

This section is not required if you have completed B-4.

Noted.

1. Please complete the worksheet named “B-4 Upwards sales” to demonstrate that the sales listings in D-2 and F-2 are complete.
 - You must provide this list in electronic format using the template provided.
 - Please use the currency that your accounts are kept in.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
2. Please provide all documents, other than those in A-4, D-2 and F-2, required to complete the “B-4 Upwards sales” worksheet. If the documents include spreadsheets, all formulas used must be retained.
3. For any amount in the “B-4 Upwards sales” worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:

PUBLIC RECORD

- the name of the source document, including the relevant page number, in column D of the worksheet; and
- highlight or annotate the amount shown in the source document.

SECTION E DUE ALLOWANCE

E-1 Credit expense

1. Do you provide credit to any domestic customers in relation to sales of like goods (i.e. payment terms that are not on a cash or pre-payment basis)? If yes:

(a) Do you provide a rolling credit facility to your domestic customers (i.e. no specific payment terms agreed at the time of sale)? If yes:

- i. Calculate the accounts receivable turnover for each domestic customer (credit sales divided by the average accounts receivable).
- ii. Calculate the average credit term for each domestic customer by dividing 365 by the accounts receivable turnover

NatSteel provides contractual credit terms to its customers. These range in period from are [CONFIDENTIAL INFORMATION DELETED – credit terms]. The exact terms are listed in the domestic sales spreadsheet.

(b) Do you have short term borrowings or an overdraft facility? If yes, what is the interest rate, or average of interest rates?

Yes, NatSteel has short term bank borrowing facilities. The interest rates per annum on SGD borrowing were in the range of [CONFIDENTIAL INFORMATION DELETED – interest rates]. Please refer to [CONFIDENTIAL] Attachment 25 – Interest rates.

(c) Do you have term deposits or other cash product (e.g. bonds)? If yes, what is the interest rate, or average of interest rates?

No, NatSteel does not hold any such products.

2. Do you provide credit to any Australian customers in relation to sales of the goods (i.e. payment terms that are not on a cash or pre-payment basis)? If yes:

(a) Do you provide a rolling credit facility to your Australian customers (i.e. no specific payment terms agreed at the time of sale)? If yes:

[CONFIDENTIAL INFORMATION DELETED – detail of credit arrangements with customers]

- i. Calculate the accounts receivable turnover for each domestic customer (credit sales divided by the average accounts receivable).
- ii. Calculate the average credit term for each domestic customer by dividing 365 by the accounts receivable turnover

PUBLIC RECORD

- (b) If your Australian customers pay you into a foreign currency denominated account (question B-1.2(a) refers):

[CONFIDENTIAL INFORMATION DELETED – currency for Australian sales]

- i. Do you have short term borrowings or an overdraft facility denominated in the same foreign currency? If yes, what is the interest rate, or average of interest rates?
- ii. What is the interest rate, or average of interest rates, applying to term deposits or other cash product (e.g. bonds) denominated in the same foreign currency? If yes, what is the interest rate, or average of interest rates?

E-2 Packaging

1. What is the packaging used for your domestic sales of like goods?

[CONFIDENTIAL INFORMATION DELETED – details of domestic packaging]

2. What is the packaging used for your export sales of the goods to Australia?

[CONFIDENTIAL INFORMATION DELETED – details of export packaging]

3. If there are distinct differences in packaging between your domestic and export sales:

- (a) Provide details of the differences
- (b) Calculate the weighted average packaging cost for each model sold on the domestic market
- (c) Calculate the weighted average packaging cost for each model exported to Australia

There are no distinct differences between the packing used on the domestic and the Australian market.

E-3 Delivery

1. Are any domestic sales of like goods delivered to the customer? If yes, how were the transportation costs calculated in the domestic sales listing in D-2?

NatSteel has used an average of the actual monthly costs of delivering rebar to the monthly delivered sales, consistent with its previous verified practice.

2. What are the delivery terms of the export sales of the goods to Australia?

[CONFIDENTIAL INFORMATION DELETED – delivery terms]

PUBLIC RECORD

3. If the delivery terms of the Australian sales includes delivery to the port, how were the inland transport and port charges calculated in the Australian sales listing in B-2?

The total logistics costs including transport and port charges have been derived from contracted rates. [CONFIDENTIAL INFORMATION DELETED – methodology]. Details of this are included in the tab “shipping cost” for the Australian sales spreadsheet.

4. If the delivery terms of the Australian sales includes ocean freight, how was the ocean freight cost calculated in the Australian sales listing in B-2?

The ocean freight of each shipment is based on invoiced amounts and applied to each [CONFIDENTIAL INFORMATION DELETED – supply term] transaction. Details regarding this are included in the tab “Shipping costs STO Freight” of the Australian sales spreadsheet.

5. If the delivery terms of the Australian sales includes marine insurance, how was the marine insurance calculated in the Australian sales listing in B-2?

NatSteel has determined ocean insurance by applying the following premium rates of [CONFIDENTIAL INFORMATION DELETED – premium rates]

6. If the delivery terms of the Australian sales includes delivered duty paid, how were the Australian importation and delivery costs calculated in the Australian sales listing in B-2?

[CONFIDENTIAL INFORMATION DELETED – details of terms of sale].

E-4 Other direct selling expenses

1. Do you provide sales commissions for domestic sales of like goods and/or export sales of the goods? If yes, provide details.

Not applicable. NatSteel did not provide sales commissions for domestic sales or export sales during the inquiry period.

2. Are there any differences in tax liability between domestic and export sales? If yes, provide details, for example:

There are no differences in the corporate income tax liability applicable to domestic and export sales.

- What is the rate of value-added tax (VAT) on sales of the goods and like goods?

NatSteel charges 7% goods and services tax (GST) to domestic customers. Domestic sales have been reported on a GST exclusive basis. GST is not applicable to Australian sales.

PUBLIC RECORD

- How is VAT accounted for in your records in relation to sales of the goods and like goods?

Both Australian sales and domestic sales have been reported on a GST exclusive basis.

- Do you receive a VAT refund in relation to sales of the goods and/or like goods?

Where:

- **GST output tax exceeds GST input tax: NatSteel pays the difference to the Inland Revenue Authority of Singapore; and**
- **GST input tax exceeds GST output tax: NatSteel claims the difference from Inland Revenue Authority of Singapore.**

- Do you receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods?

Not applicable.

3. Are there any other direct selling expenses incurred by your company in relation to domestic sales of like goods?

- These direct selling expenses must be included in the reconciliation of direct selling expenses in B-5

NatSteel has identified differences in selling costs applicable to export and Australian sales. Specifically, there are separate cost centres for export selling costs (cost centre [CONFIDENTIAL INFORMATION DELETED – cost centre]) and for domestic selling costs. [CONFIDENTIAL] Attachment 26 illustrates domestic selling costs at columns G and H ([CONFIDENTIAL INFORMATION DELETED – amount]) and the export selling costs at columns S and T ([CONFIDENTIAL INFORMATION DELETED – amount]). The normal value should be adjusted accordingly to ensure it is properly comparable with export sales.

4. Are there any other direct selling expenses incurred by your company in relation to export sales of the goods to Australia?

- These direct selling expenses must be included in the reconciliation of direct selling expenses in B-5

NatSteel has identified differences in selling costs applicable to export and Australian sales. Specifically, there are separate cost centres for export selling costs (cost centre [CONFIDENTIAL INFORMATION DELETED – cost centre]) and for domestic selling costs. [CONFIDENTIAL] Attachment 26 illustrates domestic selling costs at columns G and H ([CONFIDENTIAL INFORMATION DELETED – amount]) and the export selling costs at columns S and T ([CONFIDENTIAL INFORMATION DELETED – amount]). The normal value should be adjusted accordingly to ensure it

is properly comparable with export sales.

E-5 Other adjustment claims

1. Are there any other adjustments required to ensure a fair comparison between the export price and the normal value (based on domestic sales, costs and/or third country sales)? If yes, provide details.
 - An adjustment will only be made where there is evidence that the difference affects price comparability.
 - Refer to Chapter 15 of the *Dumping and Subsidy Manual (November 2018)* for more information.

NatSteel reserves the right to present any other adjustment claims to the Commission on a timely basis and with supporting evidence, should such claims be unilaterally identified by NatSteel after the date of this Exporter Questionnaire response and/or if they are made necessary by presently unknown calculation methodologies that the Commission might put forward.

SECTION F THIRD COUNTRY SALES

F-1 Third country sales process

1. Are your sales processes to any third country (i.e. exports to countries other than Australia) different to the sales process described in B-1.1? If yes, provide details of the differences.

In addition to sales to Australia, NatSteel sold products to other countries, such as [CONFIDENTIAL INFORMATION DELETED – third countries]. The sales process will vary depending on the nature of the sales between NatSteel and its customers, as well as the nature of those customers.

2. Are there any third country customers related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.

[CONFIDENTIAL INFORMATION DELETED – number] customers in third countries are related to NatSteel: [CONFIDENTIAL INFORMATION DELETED – customers]. NatSteel can provide details regarding the sales process to these companies during the verification if the Commission deems that information to be relevant and necessary to undertaking the duty assessment.

3. The invoice date will normally be taken to be the date of sale. If you are making a claim that a different date should be taken as the date of sale:

NatSteel considers the date of invoice to be the date of sale.

- (a) What date are you claiming as the date of sale?
- (b) Why does this date best reflects the material terms of sale?

F-2 Third country sales listing

1. Complete the worksheet named “F-2 Third country sales”
 - This worksheet lists all export sales, summarised by country and customer, to third countries of like goods invoiced within the period.
 - If you have claimed in F-1.3 that the date of sale is one other than the invoice date, then add sales with your claimed date of sale.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
2. Provide a table listing the source of the data for each column in the export sales listing (F-2.1).

Please refer to [CONFIDENTIAL] Attachment 27 – Third country sales.

F-3 Differences in sales to third countries

1. Are there any differences in sales to third countries which may affect their comparison to export sales to Australia? If yes, provide details.

There are a range of differences that would affect any comparison, including product type and mix, trading terms and the situation in the third country's market.

SECTION G COST TO MAKE AND SELL

G-1. Production process

1. Describe the production process for the goods and provide a flowchart of the process. Include details of all products manufactured using the same production facilities as those used for the goods. Also specify all scrap or by-products that result from producing the goods.

The process to produce the goods under consideration is as follows:

First, the melt-shop recycles scrap metals into good quality steel. Essentially, the scrap is melted and refined so that once it solidifies it is a different grade of steel. NatSteel uses a finger shaft electric arc furnace to carry out its daily scrap melting process. The molten steel is then refined at the ladle furnace ("LF") and is cast into billets at the continuous casting machine ("CCM").

Secondly, the billets will then be sent directly to the rolling mill, where they will be rolled into different finished products.

[CONFIDENTIAL INFORMATION DELETED – detailed explanation of the melt shop and rolling processes]

2. Are any of your suppliers related to your company (regardless of whether it is relevant to the manufacture of the goods)? If yes, please provide details including the product or services supplied by the related company.

[CONFIDENTIAL INFORMATION DELETED – details of raw material purchases].

G-2. Cost accounting practices

1. Is your company's cost accounting system based on actual or standard costs (budgeted)?

Cost of production is based on standard cost of materials and conversion activities during the month, except for liquid steel, where cost of scrap materials are charged in at actual weighted average cost basis.

Cost of production is brought back to actual cost incurred basis at month end. The cost of finished goods inventories are valued on a weighted average basis, taking into consideration the quantity and cost of opening inventories, purchased inventories and inventories produced.

2. If your company uses standard costs:

(a) Were standard costs used as the basis of actual costs in your responses G-3.1 & G-5.1?

No, NatSteel used actual costs to complete the CTM.

PUBLIC RECORD

- (b) Have all variances (i.e. differences between standard and actual production costs) been allocated to the goods?

Under the company's cost accounting system, standard costs used during the month are actualised at month end closing. Any variances that arise between standard costs and actual costs are allocated proportionately to:

- **closing inventory;**
- **inventory issued for sales (to profit and loss); and**
- **inventory issued for downstream production (forming part of production cost of downstream products).**

All relevant variances have been allocated to the goods.

- (c) How were those variances allocated?

Variances are allocated proportionately based on "volumes" of closing inventory, inventory issued for sales and inventory issued for downstream fabrication.

- (d) Provide details of any significant or unusual cost variances that occurred during the period.

NatSteel did not observe significant or unusual cost variances during the period [CONFIDENTIAL INFORMATION DELETED – operations during inquiry period].

3. Do you have different cost centres in your company's cost accounting system? If yes, list the cost centres, provide a description of each cost centre and the allocation methodology used in your accounting system.

There is no configuration of profit centres in the company's cost accounting system. The cost centres are grouped into [CONFIDENTIAL INFORMATION DELETED – number] categories:

[CONFIDENTIAL INFORMATION DELETED – cost centres]

4. To what level of product specificity (models, grades etc.) does your company's cost accounting system normally record production costs?

[CONFIDENTIAL INFORMATION DELETED – details of accounting practices]

5. Are there any costs for management accounting purposes valued differently to financial accounting purposes? If yes, provide details of the differences.

No.

6. Has your company engaged in any start-up operations in relation to the goods? If yes:

PUBLIC RECORD

No.

- (a) Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.
- (b) State the total cost of the start-up operation and the way that your company has treated the costs of the start-up operation in its accounting records.
7. What is the method of valuation for raw material, work-in-process, and finished goods inventories (e.g. last in first out –LIFO, first in first out- FIFO, weighted average)?

Inventories are stated at the lower of cost and net realisable value. Net realisable value represents the estimated selling price less all estimated costs of completion and costs to be incurred in marketing, selling and distribution.

Scrap is the raw material of the company. Scrap purchased by the company is valued at moving average purchase price.

Cost of finished goods inventories is calculated using the weighted average method

Cost of inventories shall comprise purchase price, costs of conversion and other costs incurred in bringing the inventories to their present location and condition.

Cost of purchase of inventories comprise the purchase price (net of discount and rebate), import duties and other taxes (other than goods and services tax subsequently recoverable from the taxing authorities), and transport, handling and other costs directly attributable to the acquisition of finished goods, materials and services.

Costs of conversion of inventories comprises:

- **costs directly related to the units of production, such as direct labour, direct expenses and subcontractor costs; and**
- **an allocation of fixed and variable production overheads that are incurred in converting materials into finished goods.**

Fixed production overheads are those indirect costs of production that remain relatively constant regardless of the volume of production, such as depreciation and maintenance of factory buildings and equipment, and the cost of factory management and administration.

Variable production overheads are those indirect costs of production that vary directly, or nearly directly, with the volume of production, such as indirect materials and indirect labour.

8. What are the valuation methods for damaged or sub-standard goods generated at the various stages of production?

Sub-standard goods are downgraded to the appropriate grade of stock at standard

PUBLIC RECORD

cost during the month and re-valued at actual cost during month end costing run process. Stocks which are damaged and cannot be classified as sub-standard goods are classified as scrap at standard cost.

9. What are the valuation methods for scrap, by products, or joint products?

Non-valued by-products are iron-zinc dust feedstock, mill scale, ferrous waste and pit scrap generated from steel making.

Valuated by-products are end trim, crop ends and in-between length generated from rolling mill production process. Process scrap is generated during downstream production. They are valued at standard cost during the month and re-valued to actual cost at month end closing.

There are no joint products.

10. Are any management fees/corporate allocations charged to your company by your parent or related company? If yes, provide details

[CONFIDENTIAL INFORMATION DELETED – inter-group relations]

G-3 Cost to make on domestic market

- Complete the worksheet named "G-3 Domestic CTM".
 - This worksheet lists the quarterly cost to make the domestic models of like goods by MCC manufactured within the period, even if they are models not exported to Australia.
 - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
 - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture like goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
 - If you have claimed in B-1.8 and/or D-1.7 that the date of sale is one other than the invoice date, then provide the cost for the quarters that all domestic sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.
- Provide a table listing the source of the data for each column of the "G-3 Domestic CTM" listing.

Please refer to [CONFIDENTIAL] Attachment 28 – Domestic CTM.

G-4 Selling, General & Administration expenses

1. Complete the worksheet named "G-4.1 SG&A listing".
 - This worksheet lists all selling, general and administration expenses by account code for the most recent accounting period and the period.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Please refer to [CONFIDENTIAL] Attachment 26 – SG&A listing.

2. Complete the worksheet named "G-4.2 Domestic SG&A calculation".
 - This worksheet calculates the unit domestic SG&A for each MCC.
 - You must provide this list in electronic format using the template provided.
 - Please use the formulas provided.

Please refer to [CONFIDENTIAL] Attachment 29 – Domestic SG&A calculation.

G-5 Cost to make the goods exported to Australia

1. Complete the worksheet named "G-5 Australian CTM".
 - This worksheet lists the quarterly cost to make the Australian models of the goods under consideration by MCC manufactured within the period.
 - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
 - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
 - If you have claimed in B-1.8 that the date of sale is one other than the invoice date, then provide the cost for the quarters that all Australian sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.
2. Provide a table listing the source of the data for each column of the "G-5 Australian CTM" listing.

Please refer to [CONFIDENTIAL] Attachment 30 – Australian CTM calculation.

G-6 Cost allocation methodology

1. What is the allocation methodology used to complete in G-3 domestic CTM and G-5 Australian CTM for:

- (a) Raw materials
- (b) Labour
- (c) Manufacturing overheads

Actual consumption and cost incurred.

2. Select the domestic model (export model if you have no domestic production of like goods) with the largest production volume over the period and provide worksheets demonstrating the allocation methodology described in G-6.1 from your normal cost accounting system to the cost for that model reported in G-3.1.

Actual consumption of raw materials and period costs incurred of a cost centre are charged to the cost centre. Cost of a shared support cost centre is allocated to other cost centres which use the services and based on the percentage of usage as set in SAP.

Please refer to [CONFIDENTIAL] Attachment 31 – Domestic Allocation Methodology.

G-7 Major raw material costs

1. What are the major raw materials used in the manufacture of the goods?

Billet is the major raw material in rebar. NatSteel produces billet from scrap metal.

2. Are any raw materials sourced as part of an integrated production process or from a subsidiary company which your company exercise control? If yes, complete the worksheet named “G-7.2 Raw material CTM” for these raw materials.

- This worksheet lists the quarterly cost to make the raw material manufactured within the period.
- The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold).
- If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the raw material, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as ‘other costs’ if not already included, for example, under material costs.
- You must provide this list in electronic format using the template provided.
- If you have used formulas to complete this worksheet, these formulas must be retained.

PUBLIC RECORD

[CONFIDENTIAL INFORMATION DELETED – details of raw material sources]

3. Using the domestic cost data in “G-3 Domestic CTM” (use “G-5 Australian CTM” if you have no domestic production of like goods), calculate the weighted average percentage of each raw material cost (listed in G-7.1) as a proportion of total cost to make.

As per the above explanation, the only physical raw material of rebar is billet. NatSteel produces this billet from scrap.

4. For each raw material identified in G-7.3 which individually account for 10% or more of the total cost to make, complete the worksheet named “G-7.4 Raw material purchases”
- This worksheet lists all raw material purchases (i.e. transaction by transaction) purchased by your company within the period.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Please refer to [CONFIDENTIAL] Attachment 33 – Raw Material Purchases.

5. Provide a table listing the source of the data for each column of the “G-7.4 Raw material purchases” listing.

Please refer to [CONFIDENTIAL] Attachment 33 – Raw Material Purchases.

6. For each raw material:
- (a) Select the two largest invoices by value and provide the commercial invoice and proof of payment.
 - (b) Reconcile the total value listed in “G-7.4 Raw material purchases” listing to relevant purchase ledgers or trial balances in your accounting system. Provide copies of all documents used to demonstrate the reconciliation.

Please refer to:

- [CONFIDENTIAL] Attachment 34 – invoice 2050002996;
- [CONFIDENTIAL] Attachment 35 – payment for invoice 2050002996;
- [CONFIDENTIAL] Attachment 36 – invoice 2050003089; and
- [CONFIDENTIAL] Attachment 37 – payment for invoice 2050003089.

Please refer to Attachment to [CONFIDENTIAL] Attachment 38.

7. Are any of the suppliers in “G-7.4 Raw material purchases” listing related to your company? If yes, please provide details on how the price is set.

[CONFIDENTIAL INFORMATION DELETED – details of raw material purchases]

G-8 Reconciliation of cost to make to audited financial statements

1. Please complete the worksheet named “G-8 Upwards costs” to demonstrate that the cost listings in G-3 and G-5 are complete.
 - You must provide this list in electronic format using the template provided.
 - Please use the currency that your accounts are kept in.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
2. Please provide any documents, other than those in A-4, G-3 and G-5, required to complete the “G-8 Upwards costs” worksheet.
3. For any amount that is hard coded (i.e. not a formula), please cross-reference by providing:
 - the name of the source document, including the relevant page number, in column D of the worksheet; and
 - highlight or annotate the amount shown in the source document.

Please refer to [CONFIDENTIAL] Attachment 40 – cost reconciliation.

G-9 Capacity Utilisation


4. Please complete the worksheet named “G-9 Capacity Utilisation”.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Please refer to [CONFIDENTIAL] Attachment 41 –capacity utilisation.

EXPORTER'S DECLARATION

I hereby declare that NatSteel Holdings Pte Ltd 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 : Arthur Tay

Signature : 

Position in
Company : Senior Vice President

Date : 29th Apr 2020

APPENDIX

GLOSSARY OF TERMS

This glossary is intended to provide you with a basic understanding of technical terms that appear in the questionnaire.

Adjustments

To enable a fair comparison between the export price and the normal value Australian legislation provides for the adjustment of the domestic price paid for like goods. Adjustments are made to account for sales occurring at different times, specification differences, and differences in the terms or circumstances of the sales. The adjustment to the normal value may be upward or downward. Areas where you believe an adjustment is necessary should be identified. Section E of the questionnaire refers.

Examples of adjustments that may be made include: *sales occurring at different times* (it is sometimes necessary to compare domestic and export sales made at different times - in these circumstances an adjustment may be made to reflect price movements during that time); *specification differences*; *packaging*; *taxes*; *level of trade*; *advertising*; *servicing/warranty*; *inland freight*; *warehousing*; *export charges*; *credit terms*; *duty drawback*; *commissions*.

Adjustments may also be required where the normal value is based on costs to make and sell.

Arms length

Sales are not considered to be at "arms length" on your domestic market if there is any consideration payable for the goods other than their price, or there is an association between the buyer and the seller which affects the price, or there will be a reimbursement, compensation or benefit for, or in respect of, the price.

Constructed value

In cases where prices paid for like goods sold in the country of export cannot be used for the determination of normal value, i.e. when there are no or insufficient sales or where such sales were not made in the ordinary course of trade, normal value may be based on a constructed value. Constructed value is calculated on the basis of the cost of production of the goods under consideration plus a reasonable amount for selling, general and administration costs, and for profits, that are associated with sales on the domestic market of the country of export.

Cost of production/manufacturing

The cost of production or manufacture consists of all manufacturing costs associated with the goods. It is the sum of direct materials, direct labour and factory overheads.

Cost to make and sell

The cost to make and sell is the sum of the cost of production or manufacture, and the selling, general and administration costs associated with the sale of those goods.

Country of origin

The country in which the last significant process in the manufacture or production of the goods was performed.

PUBLIC RECORD

Date of sale

The Commission will normally use the invoice date as recorded in the exporter or producer's records. Another date may be used if this better reflects the material terms of sale. The questionnaire directs attention to matching data sets of domestic and export sales where some other date is used, as well as matching cost information.

Direct labour cost

Direct labour is categorised as a variable cost, i.e. the value varies with the level of production.

Dumping

Dumping occurs when the products of one country are exported to another country at a price less than their normal value.

Dumping margin

Where the export price is less than the normal value the dumping margin is the amount of the difference. It can be expressed as a value or as a percentage of the export price.

Export price

The export price of the goods is usually the price paid or payable to the exporter in arms length transactions, in most instances calculated at the Free on Board (FOB) level.

Exporting country

The country of export is normally the country of origin from which the goods are shipped. The country of export may be an intermediate country, except where the products are merely transhipped through that country, or the products concerned are not produced in that country, and there is no comparable price in that country.

Factory overheads

Factory overheads consist of variable costs e.g. power, supplies, indirect labour and fixed costs e.g. factory rent, factory insurance, factory depreciation etc.

Goods under consideration (the goods)

The goods to which the application for anti-dumping action relates. That is, the goods that you have exported to Australia allegedly at dumped prices.

Incoterms

The following abbreviations are commonly used (comment is provided concerning costs that are normally borne by the seller):

EXW	ex works (the seller's minimum obligation as costs relate to goods being made available at the sellers premises)
FCA	free carrier (main carriage not paid by seller. Pay costs until such time that the goods have been delivered at the named point into custody of a carrier named by the seller. Customs formalities, taxes etc. paid if required)

PUBLIC RECORD

FAS	free alongside ship (main carriage not paid by seller. Deliver the goods alongside the ship)
FOB	free on board (main carriage not paid by seller. Deliver the goods on board, provide export clearance if required, pay loading costs to the point the goods have passed the ship's rail, pay customs formalities, taxes etc. payable upon exportation)
CFR	cost and freight (main carriage paid by seller. Pay all costs until delivered as well as freight, loading and unloading, pay customs formalities, taxes etc. payable upon exportation)
CIF	cost, insurance and freight (main carriage paid by seller. Pay all costs as under CFR as well as marine insurance) the terms CFR and CIF are only used where goods are carried by sea or waterway transport
CPT	carriage paid to
CIP	carriage and insurance paid to the terms CPT and CIP are used as alternatives to CFR and CIF where the goods are carried by air, road, rail etc.
DAF	delivered at frontier (goods carried by rail or road and cleared for export at the named place at the frontier. Pay costs until delivered at the frontier plus any discharge costs incurred to place the goods at the customer's disposal)
DES	delivered ex ship (goods made available to the buyer on board the ship uncleared for import at the named port of destination. Pay all costs incurred in placed at the disposal of the buyer, pay customs formalities, taxes etc. payable upon exportation, and where necessary for transit through another country)
DDU	delivered duty unpaid (Pay all costs for carriage to the agreed point, pay customs formalities, taxes etc. payable upon exportation, and where necessary for transit through another country)
DDP	delivered duty paid (goods made available at the named place in the country of importation – all risks and costs being incurred by the seller including duties, taxes etc. incurred upon importation)

The period

A period defined by the Commission over which importations of the goods are examined.

Like goods

Like goods are goods sold on the domestic market of the country of export (or to a third country) that are identical in all respects to the goods or that, although not alike in all respects have characteristics closely resembling those of the goods. The term 'like goods' also refers to the goods produced by the Australian industry allegedly being injured by dumped imports.

Normal value

PUBLIC RECORD

Australian legislation sets out several ways to assess "normal value".

The preferred method is to use the price paid for like goods sold for domestic consumption in the country of export. Usually, these sales are made by you, but there may be circumstances where it is appropriate to use sales made by other sellers on the domestic market.

Sale prices must be at arms length and in the ordinary course of trade. In the absence of relevant or suitable domestic sales, the normal value may be determined by constructing a price based on all costs to make and sell the goods, and an amount for profit. Alternatively the normal value may be ascertained using the price paid for like goods sold in the ordinary course of trade at arms length to customers in a country other than Australia, however this option is rarely used.

Finally, when a normal value cannot be ascertained by any of the above methods, or if no information is provided, the Commission will determine the normal value by considering all the relevant information, including the applicant's information. This allows the applicant's information to be used where sufficient information has not been furnished or is not available.

Where domestic price generally, and the trade of the exporting country are determined or substantially influenced by the government of the exporting country, an alternative/surrogate market economy is selected by the Commission and the normal value is determined as if the surrogate country were the export source.

Ordinary course of trade

Testing for "ordinary course of trade" includes a comparison of the selling price and the unit cost to make and sell for the same period. If sales in respect of a substantial quantity of goods over an extended period of time, usually 12 months, do not recover all costs and these losses are not likely to be recovered within a reasonable period of time, (again usually 12 months) then the sales are regarded as being not in the ordinary course of trade.

There may be circumstances where it is appropriate to use a period other than 12 months in assessing whether sales are in the ordinary course of trade.

Unprofitable sales are to be taken to have occurred in substantial quantities during an extended period where the unprofitable sales amount to 20% or more of the total volume of sales of the goods by the exporter over the period. An extended period of time is usually taken to be a period not less than 12 months. Where unprofitable sales are rejected, normal value is based upon remaining profitable sales provided they occur in sufficient number. Where all sales have been made at a loss, or profitable sales are insufficient, the normal value may be constructed from costs to make and sell.

Selling, general and administration expenses (SG&A)

The selling, general and administration expenses includes all selling, distribution, general and administration expenses including finance costs that would be incurred if the goods were sold for domestic consumption in the country of export. The amounts are determined in each case using all the available information and may include expenses incurred in:

- . domestic sales of like goods;
- . sale of goods of the same general category by the exporter; or
- . sales in the industry in the country of export.

The expenses must, however, reflect the selling, general and administration costs of the goods.

PUBLIC RECORD

Administrative and selling expenses include: director's fees, management salaries and benefits, office salaries and benefits, office supplies, insurance, promotion, entertainment, depreciation and corporate overheads.