



Anti-Dumping Notice No. 2016/28

*Public Notice under section 269TD of the Customs Act 1901*

**Certain Chrome Bar Exported from Italy and Romania**

**Investigation 319 into Alleged Dumping**

**Preliminary Affirmative Determination**

**and Imposition of Securities**

**1. Introduction**

The purpose of this notice is to set out the reasons why I, Dale Seymour, Commissioner of the Anti-Dumping Commission (the Commissioner) have made a preliminary affirmative determination (PAD) under subsection 269TD(1) of the *Customs Act 1901*<sup>1</sup>, in relation to the investigation into the alleged dumping of certain chrome bar exported to Australia from Italy and Romania. I make this PAD on 24 March 2016, being later than 60 days after the initiation of this investigation on 10 November 2015.<sup>2</sup>

This notice and the preliminary findings contained in this document reflect the current status of the investigation. My preliminary findings may change as a result of further information, submissions, analysis or verification.

**1.1 Reasons for making a PAD**

The Commission has completed a preliminary assessment of dumping margins. The Commission's assessment shows that exports of chrome bar from Romania in the investigation period were at dumped prices. The volume and dumping margins of the dumped goods were not negligible.

Having regard to the application, submissions received concerning publication of the dumping duty notice and other information I considered relevant (refer to heading 9 and Attachment A) and pursuant to subsection 269TD(1)(a), I am satisfied there appears to be sufficient grounds for the publication of a dumping duty notice in respect of chrome bar exported to Australia from Romania. As a result, I have made a PAD to that effect, pursuant to section 269TD.

Under subsection 269TD(4)(b), I am satisfied that it is necessary to require and take securities to prevent material injury to the Australian industry occurring while the investigation continues.

The Commonwealth may require and take securities under section 42 in respect of interim dumping duties that may become payable in respect of the goods imported from Romania and entered for home consumption in Australia on or after **Wednesday 30 March 2016**.

The security has been determined using an *ad valorem* duty method and will be imposed on goods exported to Australia from Romania at the rate specified in the table of preliminary dumping margin assessments under heading 5.2.

<sup>1</sup> All legislative references are to the *Customs Act 1901*, unless otherwise stated.

<sup>2</sup> Day 60 of this investigation was 9 January 2016.

## **2. Background**

On 10 November 2015, I initiated an investigation into the alleged dumping of chrome bar following an application by Milltech Pty Ltd (Milltech) under section 269TB. Further details regarding the initiation of the investigation can be found in *Consideration Report No. 319* (CON 319)<sup>3</sup> and the public notice dated 10 November 2015 (refer to *Anti-Dumping Notice* (ADN) No. 2015/130 at [www.adcommission.gov.au](http://www.adcommission.gov.au)).<sup>4</sup>

The investigation period is 1 October 2014 to 30 September 2015 and the injury analysis period is from 1 July 2011.

Under subsection 269TD(1), I may make a PAD at any time, but not earlier than 60 days after I initiate an investigation for the publication of a dumping duty notice, provided I am satisfied that:

- there appears to be sufficient grounds for the publication of such a notice; or
- it appears that there will be sufficient grounds for the publication of such a notice subsequent to the importation into Australia of such goods.

In accordance with the *Customs (Preliminary Affirmative Determinations) Direction 2015* (the PAD Direction), 60 days after the initiation of such an investigation I must either make a PAD or publish a Status Report outlining the reasons why I have not made a PAD.

Day 60 of this investigation was 9 January 2016. On 11 January 2016, the next business day, I published a Status Report, which can be found on the public record at [www.adcommission.gov.au](http://www.adcommission.gov.au).<sup>5</sup> Section 9 of the PAD Direction instructs me to reconsider whether or not to make a PAD at least once prior to the publication of the statement of essential facts.

## **3. Evidence relied upon**

In deciding to make a PAD, I have, in accordance with subsection 269TD(2), had regard to:

- Milltech's application;
- all importers' questionnaire responses;
- all exporters' questionnaire responses;
- one submission received; and
- any other matters that I considered relevant including information obtained from the applicant, exporters and importers during verification visits.<sup>6</sup>

Further details of the evidence relied upon in making this PAD can be found in Attachment A.

## **4. Australian industry producing 'like goods'**

### **4.1 The goods the subject of the investigation**

The goods which are the subject of this investigation (the goods) are:

<sup>3</sup> Refer to Case No. 319 on the [Public Record](#) at Item 2.

<sup>4</sup> Refer to Case No. 319 on the [Public Record](#) at Item 1.

<sup>5</sup> Refer to Case No. 319 on the [Public Record](#) at Item 8.

<sup>6</sup> Milltech's application, questionnaire responses and reports of visits are available on the [Public Record](#).



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*Chromium plated circular solid steel bars (chrome bars) that have all of the following characteristics:*

- *circular cross section;*
- *made from alloy or non-alloy steel bar;*
- *chrome plating of any thickness;*
- *lengths not greater than 8 meters; and*
- *diameters in the range 18mm to 170mm.*

Further information regarding the goods the subject of the investigation can be found in CON 319 and ADN No. 2015/130.

### 4.2 Tariff classifications

The goods are classified to the tariff subheadings:

- 7215.90.00 (statistical code 55);
- 7215.50.90 (statistical code 54);
- 7228.30.10 (statistical code 70);
- 7228.60.10 (statistical code 72); and
- 7228.60.90 (statistical code 55)

of Schedule 3 to the *Customs Tariff Act 1995*.

The goods exported to Australia from Italy are subject to a five per cent rate of Customs duty. Goods exported to Australia from Romania are subject to a zero rate of Customs duty for classifications 7215.90.00 and 7228.60.90, and a four per cent rate of Customs duty for the other tariff classifications.

ADN No. 2015/130 also included tariff classification 7222.30.00 (statistical codes 37 and 38) as a tariff classification to which the goods were classified. The Commission received a submission from Valbruna Australia concerning the inclusion of tariff classification 7222.30.00, which is described as 'other bars and rods of stainless steel'. The submission recommended the Commission exclude tariff classification 7222.30.00 from the investigation for three reasons: the Australian industry does not use stainless steel to produce chrome bar; no chrome bar has been imported to Australia under that classification, and the investigation only relates to chrome bar made from alloy or non-alloy steel bar.

The Australian industry has advised the Commission that it does not consider stainless steel bar to be the goods. This is because the Australian industry does not use stainless steel bar to manufacture chrome bar and does not compete with the exporters in this field. The Australian industry uses steel grades 1045 and 4140 for manufacturing chrome bar.

On the basis of this analysis, the Commission excluded tariff classification 7222.30.00 from the investigation. ADN No. 2016/22 provides advice of this change.

### 4.3 Consideration report findings

An application can only be made if there exists an Australian industry producing 'like goods' to the goods the subject of the application. Like goods are defined under subsection 269T(1). Subsections 269T(2), 269T(3), 269T(4), 269T(4A), 269T(4B) and 269T(4C) determine whether the like goods are produced in Australia and whether there is an Australian industry.

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In CON 319, the Commission was satisfied that there is an Australian industry producing like goods on the basis that:

- Milltech produces goods that have characteristics closely resembling the goods the subject of the application; and
- the like goods are wholly manufactured in Australia.

### **4.4 Australian industry producing 'like goods' – preliminary assessment**

Since the initiation of the investigation, the Commission has undertaken a verification visit to Milltech to verify the findings in CON 319. As a result of information verified during the visit, I am satisfied that there is an Australian industry producing like goods to the goods the subject of the application and that the like goods are produced in Australia.<sup>7</sup>

## **5. Dumping**

### **5.1 Exporter questionnaires received**

The Commission received exporter questionnaire responses from the following exporters:

- Stelmi S.p.A. (Italy) (Stelmi);
- Nimet srl (Romania) (Nimet); and
- ASO Cromsteel (Romania) (Cromsteel).

I note that Stelmi is an exporter from Italy, and Nimet and Cromsteel are exporters from Romania. These were the only exporters of chrome bar in the investigation period.

### **5.2 Dumping margins**

Having regard to the exporter questionnaire responses received, the Commission has determined the following dumping margins in relation to chrome bar exported from Italy and Romania to Australia in the investigation period:

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<sup>7</sup> A report of the visit to Milltech is available on the [Public Record](#).



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Country	Exporter	Export Price <sup>8</sup>	Normal Value <sup>9</sup>	Preliminary Dumping Margin <sup>10</sup>
Italy	Stelmi	269TAB(1)(a)	269TAC(1)	-6.0%
Romania	Nimet	269TAB(1)(a)	269TAC(1)	46.1%
	Cromsteel	269TAB(1)(a)	269TAC(1) and 269TAC(2)(c)	22.4%
	All Others	269TAB(3)	269TAC(6)	78.2%

**Table 1: Preliminary Dumping Margin Summary**

### 5.3 Dumping – preliminary assessment

Given the preliminary dumping margins presented in Table 1, I am preliminarily satisfied that certain chrome bar exported to Australia from Romania during the investigation period was at dumped prices and that:

- the margins of dumping were not negligible;<sup>11</sup> and
- the volume of dumped goods was not negligible.<sup>12</sup>

The Commission has investigated alleged dumping of chrome bar from Italy and has preliminarily assessed that chrome bar exported from Italy has not been at dumped prices. The Commission has found that there were no exports of chrome bars from any other Italian exporters during the Investigation period. As a result, this PAD will focus on the chrome bar exported from Romania, which have been preliminarily found to be dumped.

<sup>8</sup> Export prices for goods exported to Australia by the exporters specifically named in Table 1 have been determined under subsection 269TAB(1)(a) as the price paid by the importer to the exporter in an arm's length transaction, less transport and other costs arising after exportation. I am satisfied that the goods were exported to Australia otherwise than by the exporter as required by subsection 269TAB(1)(a)(i). In relation to 'All Other Exporters', sufficient information is not available to enable the export price to be ascertained under the preceding subsections and therefore the export price was determined under subsection 269TAB(3) by having regard to all relevant information.

<sup>9</sup> Normal value of goods exported to Australia by Stelmi and Nimet have been determined under subsection 269TAC(1) based on their domestic sales of comparable models (i.e. the price paid for sales of like goods) in the ordinary course of trade for home consumption in the country of export in sales that are arm's length transactions. For Cromsteel, the normal value was determined under subsections 269TAC(1) and 269TAC(2)(c). In accordance with subsection 269TAC(8), the Commission considers that certain adjustments are necessary to ensure fair comparison of normal values with export prices, including adjustments for physical differences where exact model matches have not been found. However, for models where there are insufficient sales in the ordinary course of trade and there are no reasonable adjustments to ensure fair comparison of normal values with export prices, the Commission considers that normal value cannot be ascertained under subsection 269TAC(1). Therefore, for those models, normal values have been determined under subsection 269TAC(2)(c). In relation to 'All Other Exporters', sufficient information is not available to enable normal value to be ascertained under the preceding subsections and therefore the normal value was determined under subsection 269TAC(6) by having regard to all relevant information.

<sup>10</sup> Dumping margins were calculated for all exporters by comparing the weighted average of export prices over the whole of the investigation period with the weighted average of corresponding normal values over the whole of that period, in accordance with subsection 269TACB(2)(a). Where appropriate, adjustments were made pursuant to subsections 269TAC(8) for all exporters to ensure the comparability of normal values to export prices.

<sup>11</sup> Subsection 269TDA(1)

<sup>12</sup> Subsections 269TDA(3) and (4)

## 6. Injury to the Australian Industry

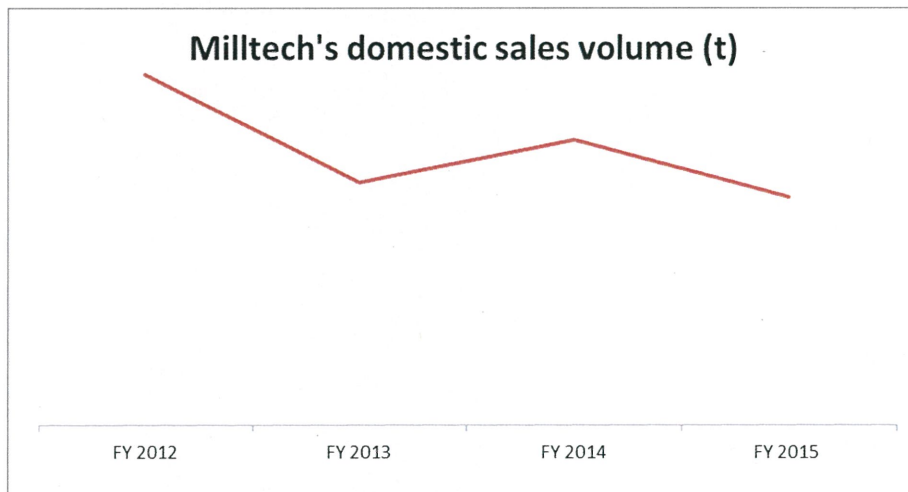
### 6.1 Preliminary findings

Based on the Commission's verification of the information provided by the Australian industry, I am preliminarily satisfied that there appears to be reasonable grounds to support the claims that the Australian industry has suffered injury in the injury analysis period in the form of:

- Volume effects:
  - loss of sales volume;
- Price effects:
  - price depression;
  - price suppression;
- Profit effects:
  - loss of profits; and
  - reduced profitability.

### 6.2 Volume effects

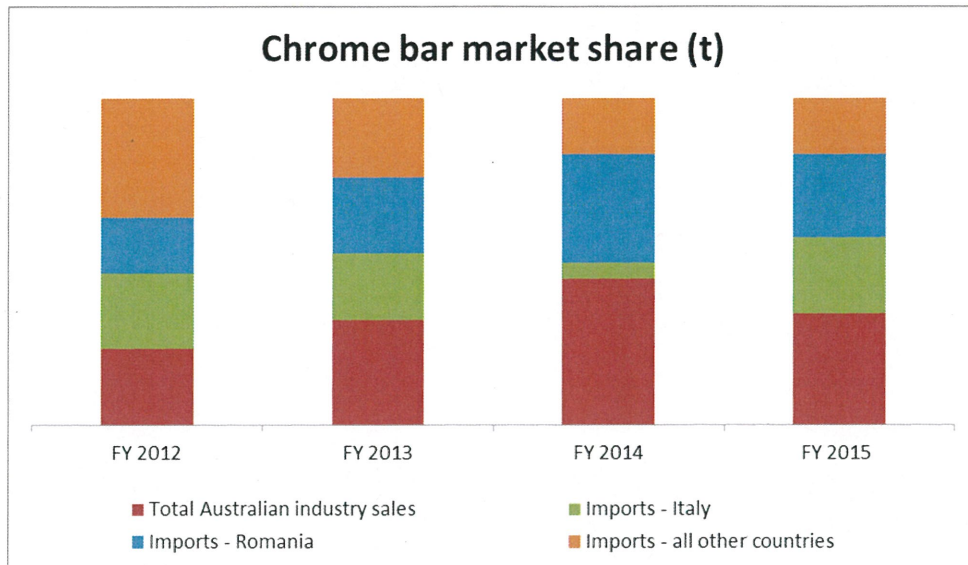
Figure 1 demonstrates Milltech's domestic sales volumes have fallen in the injury analysis period by approximately one third.



**Figure 1: Milltech's domestic sales volume** (Source: verified data provided by Milltech)

Figure 2 shows the market share of the Australian industry and exporters. This graph is an updated version of the graph that was in CON319, and reflects the removal of goods imported under tariff classification 7222.30.00 (see section 4.3) The graph demonstrates that, over the injury analysis period, Milltech's market share grew from about a quarter of the market in FY2012 to nearly half of the market in FY2014, before falling to about one third in FY2015. The proportion of imports also changed during the injury analysis period, with imports accounting for approximately 75 per cent of volume in FY2012 and falling to about 50 per cent in FY2014. Imports then rose to about 66 per cent in FY2015. I note that the Australian market for chrome bar has decreased in volume terms since FY2012.





**Figure 2: Market share of chrome bar in Australia** (Source: ABF import data and verified data provided by Milltech)

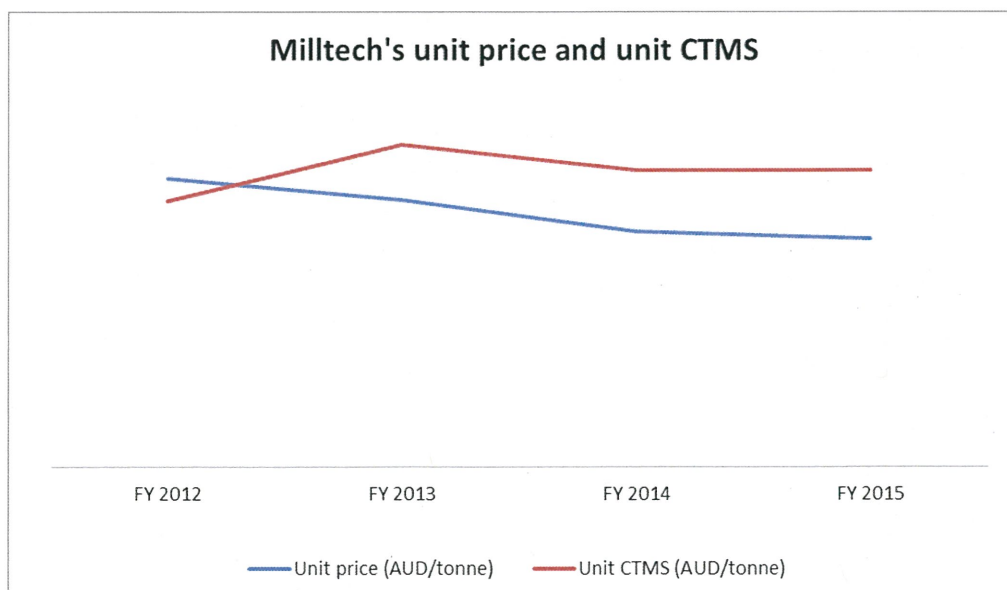
The Commission has preliminarily found that Milltech has suffered injury in the injury analysis period in the form of reduced sales volumes. I am not satisfied at this stage of the investigation that the injury the Australian industry has suffered is in the form of lost market share.

### 6.3 Price and profit effects

#### 6.3.1 Price depression and price suppression

Price depression occurs when a company, for some reason, lowers its prices. 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.

Figure 3 indicates that Milltech's weighted average net unit prices (per tonne) have fallen over the injury analysis period. It also demonstrates that Milltech's unit cost to make and sell (per tonne) has increased over the injury analysis period, and therefore the margin between prices and costs has increased.

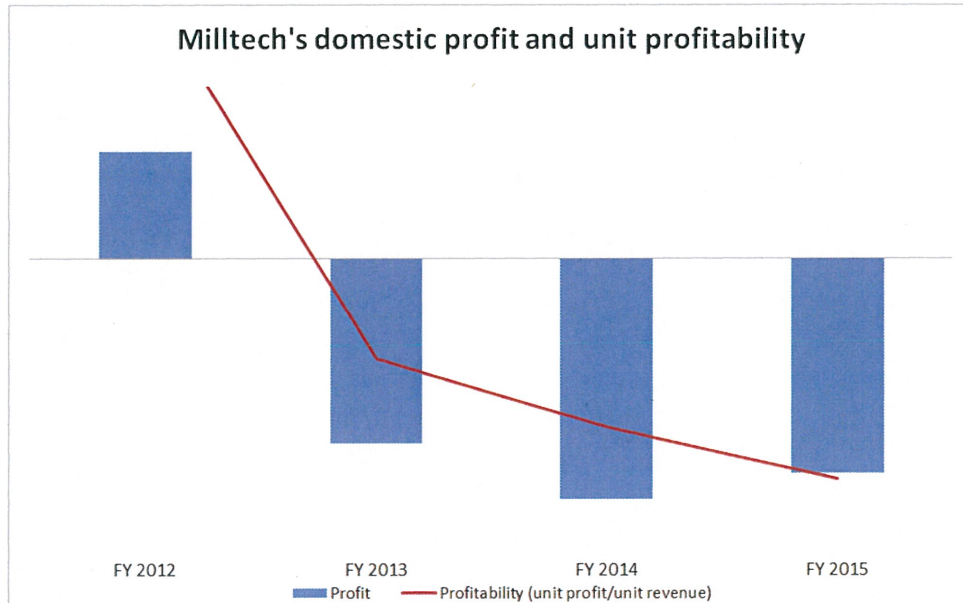


**Figure 3 – Milltech's unit selling price and unit cost to make and sell for chrome bars** (Source: verified data provided by Milltech)

The Commission has preliminarily found that the applicant has suffered price depression and price suppression.

### 6.3.2 Profit and profitability

Figure 4 indicates that Milltech's total profit and unit profitability (unit profit measured as a percentage of unit revenue) has declined over the injury analysis period.



**Figure 4: Milltech's total domestic profit and unit profitability during injury analysis period**  
(Source: verified data provided by Milltech)

### 6.4 Injury to the Australian industry – preliminary assessment

Based on the Commission's investigations, I preliminarily consider that the number of injury factors and their magnitude is such that the injury suffered by the Australian industry is material.

The Commission will further analyse any additional information obtained, or provided to it, during the course of the investigation.

## 7. Cause of injury

The matters that may be considered in determining whether an Australian industry has suffered injury caused by dumping are set out in section 269TAE, to which I have had regard.

### 7.1 Size of the dumping margins

Subsection 269TAE(1)(aa) provides that regard may be given to the size of each of the dumping margins, worked out in respect of goods of that kind that have been exported to Australia.

The dumping margins outlined above under heading 5.2, ranging between 22.4 per cent and 46.1 per cent are above negligible levels (above 2 per cent). The Commission considers that the magnitude of dumping provided exporters with the ability to offer chrome bar to importers at lower prices than would otherwise have been the case, as is demonstrated in the price undercutting analysis under heading 7.1.1 of this PAD.



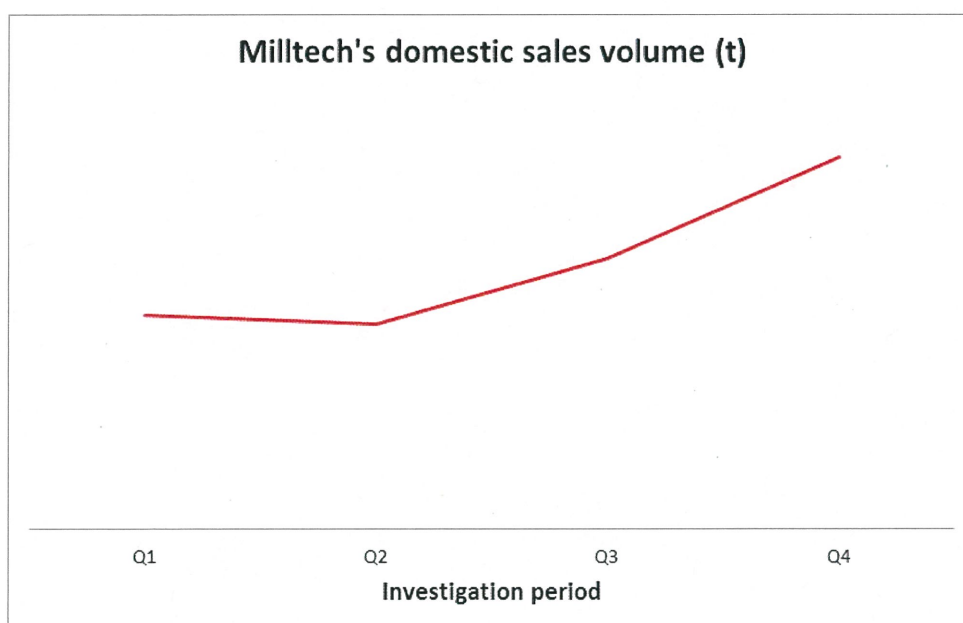
### 7.1.1 Price undercutting

In order to analyse price undercutting, the Commission compared free into store unit prices of imported goods to Milltech's prices for each steel grade at a comparable level of trade. The Commission has conducted this analysis using the most common grades of chrome bar sold in Australia and the major sources of exports of chrome bar from Romania.

The Commission has preliminarily found that Milltech's prices for its major selling models and grades of chrome bar were undercut by sales of exports of chrome bar from Romania by between 4 per cent and 41 per cent.

### 7.2 Volume effects

I have preliminarily found that the Australian industry has suffered injury in the form of reduced sales over the injury analysis period. However, because the volume of sales achieved by the Australian industry increased over the investigation period, as indicated in figure 5, I am not satisfied at this stage of the investigation that the injury the Australian industry has suffered in the form of volume effects over the injury analysis period can be attributed to dumping.



**Figure 5: Milltech's domestic sales volume over the investigation period** (Source: verified data provided by Milltech)

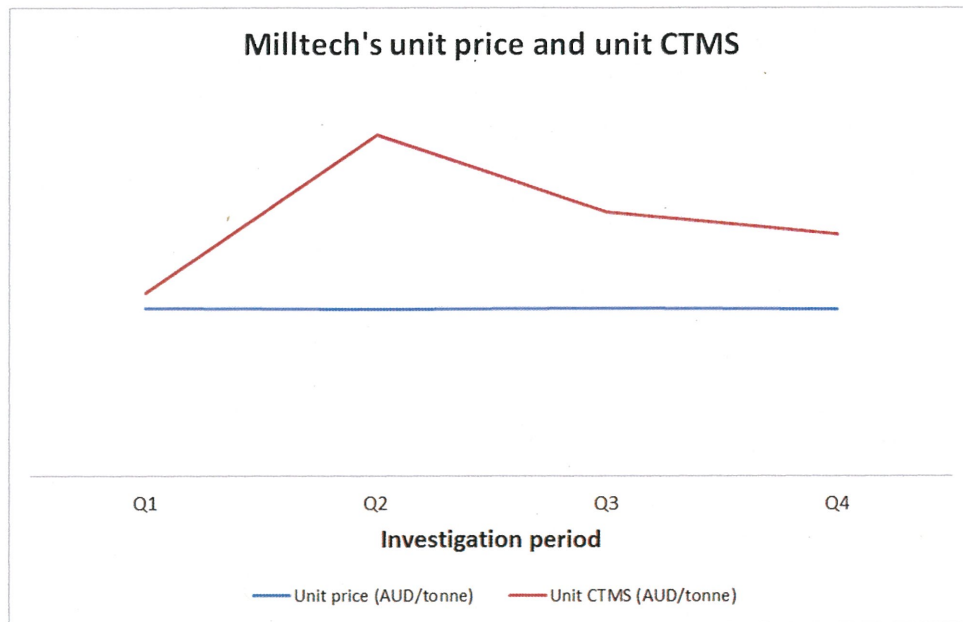
The Commission will further analyse any additional information obtained, or provided to it, in respect of volume effects during the course of this investigation.

### 7.3 Price and profit effects

In CON319, the Commission observed that the market for chrome bars in Australia is a *commodity* market with price being a key factor affecting purchase decisions. Milltech submitted that its unit sales prices have fallen over the injury analysis period in response to low import price offers for the goods exported from Italy and Romania.

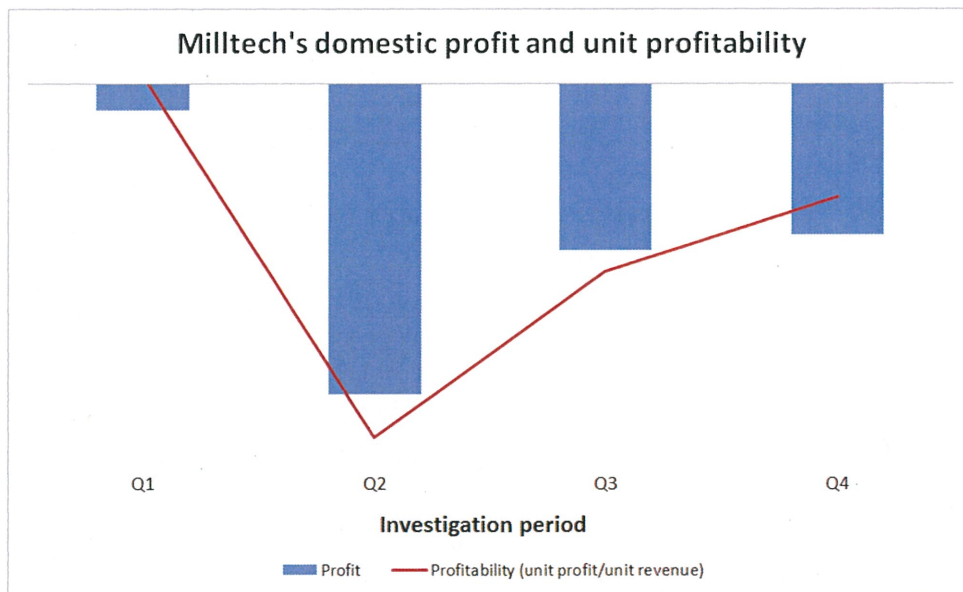
Figure 6 indicates that the Australian industry has not achieved unit prices that cover its unit costs to make and sell chrome bar over the investigation period.

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**Figure 6: Milltech's unit selling price and unit cost to make and sell for chrome bars over the investigation period** (Source: verified data provided by Milltech)

Figure 7 indicates that the profits and unit profitability of (unit profit measured as a percentage of unit revenue) Australian industry have fallen over the investigation period.



**Figure 7: Milltech's total domestic profit and unit profitability over the investigation period** (Source: verified data provided by Milltech)

The Commission's preliminary analysis indicating the downward trend of the weighted average FOB export price of the allegedly dumped imports (as charted in Figure 7 in CON319) supports Milltech's claim that it suffered injury in the form of price depression in response to competition from lower priced chrome bar exported from Romania. In turn, this has resulted in Milltech achieving reduced profit and profitability due to competition from chrome bar exported from Romania at dumped prices.

### 7.4 Other causes of injury

Milltech contended in its application that sales of chrome bar exported from Italy and Romania at dumped prices are the main source of the injury it has experienced. Milltech did not provide any further evidence of other causes of injury.



The Commission has preliminarily found that chrome bar exported from Italy was not at dumped prices. The Commission notes that the Australian industry has lost market share in the investigation period to imports of chrome bar from Italy. The Commission has found that importers often have a preference to purchase chrome bar from suppliers that can also supply the tubes with which chrome bar is used in the manufacture of hydraulic and pneumatic equipment. This allows importers to reduce their freight and importation costs per unit of chrome bar and provides them with a competitive advantage over the Australian industry which does not supply the tubes. Although both Romanian and Italian exporters of chrome bar supply both chrome bar and tubes, the Commission understands that the Italian exporter of chrome bar has achieved its market performance in part due to its ability to supply tubes as well as chrome bar.

The Commission has also preliminarily found that chrome bar exported from Romania is a major influence on prices in the Australian chrome bar market.<sup>13</sup> Notwithstanding that chrome bar exported from Italy may have influenced prices in the Australian chrome bar market, and that this may have caused injury to the Australian industry in the forms of volume, price and profit effects, I preliminarily consider that the sale of chrome bar exported from Romania at dumped prices, of itself, has caused injury in those forms to the Australian industry.

At visits to importers of chrome bar, the Commission has found that demand for chrome bar in Australia has fallen in recent years as a result of various factors including:

- falling investment levels in the mining industry; and
- increased imports of finished hydraulic cylinders, which include chrome bar as a component, by end users at the expense of purchases of chrome bar used in the manufacture of those products.

In its application and during the visit by the Commission, Milltech claimed any price or volume effects as a result of falling investment in the mining sector was offset by demand from other industries.

The Commission notes that the size of the market for chrome bar has fallen significantly in volume terms since 2012, and that this timeframe coincides with falling investment in the mining sector. The Commission considers that reduced demand in the chrome bar market is likely to have contributed to price depression and suppression. However, I am satisfied for the purposes of this PAD that the prices achieved by the Australian industry were depressed and suppressed, in part, to compete with chrome bar exported from Romania at dumped prices.

### **7.5 Cause of injury – preliminary assessment**

Based on the Commission's price undercutting analysis, verification of Milltech's injury claims and the preliminary dumping margin calculations, and for the purposes of this PAD, I preliminarily consider that:

- importers are provided a competitive advantage due to the ability to purchase the goods at what the Commission has preliminarily found to be dumped prices. This allows importers to be more competitive on price than otherwise would be the case;
- the Australian industry's prices were depressed and suppressed due to competition with chrome bar exported from Romania at dumped prices, which in turn has caused injury in the forms of price depression, price suppression, reduced profit and reduced profitability;

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<sup>13</sup> See Confidential Attachment 4



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- in the absence of dumping, it is likely that the Australian industry would be in a better position to achieve pricing at levels necessary to achieve a profit; and
- the number of injury factors and their magnitude is such that the injury suffered by the Australian industry is material.

As such, I am satisfied for the purposes of the PAD that there appears to be sufficient grounds to support the conclusion chrome bar exported from Romania at dumped prices has caused material injury to the Australian industry.

### 8. Non-injurious price

The Commission has not received any submissions from interested parties in relation to non-injurious price (NIP). The NIP is relevant to subsection 8(5B) of the *Customs Tariff (Anti-Dumping) Act 1975* which requires consideration of the desirability of fixing a lesser amount of duty if sufficient to remove injury to the Australian industry. The Commission also utilises the NIP as an additional test to establish whether there is a causal link between the alleged dumping and material injury by comparing the NIP to the weighted average export prices, as set out below.

For the purposes of this PAD, I have determined that the NIP can be determined by setting the unsuppressed selling price equal to Milltech's cost to make and sell during the investigation period, uplifted by profit from Milltech for the FY2012 period, a period claimed by the Australian industry to be unaffected by dumping. As indicated above in Figure 3 in section 6.3.1, Milltech's unit cost to make and sell over the injury analysis period increased whereas, conversely, its unit selling prices decreased. For this reason, in order to calculate the NIP, the Commission has deducted amounts for overseas freight, insurance, port charges, Customs charges and duty, into store costs, an importer selling general and administrative expense, and an amount for importer profit from the USP.

The Commission has compared the NIP with the calculated weighted average normal values of Cromsteel and Nimet, which have preliminarily been found to be dumping. The Commission has determined that the NIP exceeds the normal values of Cromsteel and Nimet. As a result, the NIP should not be the operative measure for exports of chrome bar from Romania, and regard should not be had to fixing a lesser rate of duty.

The Commission has also compared the NIP with the calculated weighted average export prices of Cromsteel and Nimet. The Commission has determined that the NIP exceeds the export prices of Cromsteel and Nimet. This preliminary finding supports the conclusion that dumped chrome bar exported to Australia from Romania has caused material injury to the Australian industry.

### 9. Other matters considered relevant – subsection 269TD(2)(b)

In accordance with section 7 of the PAD Direction and for the purposes of subsection 269TD(2)(b), I have considered the desirability of providing relief to the injured Australian industry as quickly as possible, where warranted.

### 10. Provisional Measures

#### 10.1 Form of duty

The forms of duty available under the *Customs Tariff (Anti-Dumping) Regulation 2013* include:

- combination fixed and variable duty method ('combination duty method');
- fixed duty method;



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- floor price duty method; and
- *ad valorem* duty method (i.e. a percentage of export price).

These forms of duty all have the same objective of removing the injurious effects of dumping. However, in achieving this objective certain forms of duty will better suit the particular circumstances of some investigations more so than other forms of duty.

The current proposed securities are recommended to be taken as an amount worked out in accordance with the *ad valorem* duty method. These securities will be imposed in relation to the goods exported to Australia from Romania at the rates specified in Table 1 of preliminary dumping margins.

For the purposes of this PAD, I have had regard to the *Guidelines on the Application of Forms of Dumping Duty – November 2013* (the Guidelines)<sup>14</sup> and note the following:

- chrome bar is prone to significant price variations over time as steel prices and demand for chrome bar fluctuate; and
- chrome bar has several different models depending on steel grade, chromium thickness and diameter. This means there is significant price variation between models.

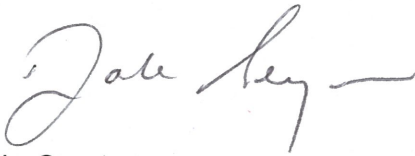
Further, the variance of chrome bar grades means that other forms of duty, especially the combination duty, are disadvantageous, as multiple ascertained export prices cannot be set for different grades.<sup>15</sup>

Further, under the *ad valorem* method, as described in the Guidelines, export prices may be lowered by exporters to avoid the effects of the duty. This is less relevant in the context of this PAD because, noting the size of the dumping margins, the cost to the exporters to lower prices by amounts equivalent to the magnitude of the preliminary dumping margins to avoid the duty are considered to be prohibitive.

Affected parties should contact [www.business.gov.au](http://www.business.gov.au) on telephone number 13 28 46 or +61 2 6213 6000 (outside Australia) for further information regarding the actual security liability calculation in their circumstance.

### 11. Anti-Dumping Commission Contact

Enquiries about this notice may be directed to the case manager on telephone number +61 3 8539 2464, fax number +61 3 8539 2499 or at [operations4@adcommission.gov.au](mailto:operations4@adcommission.gov.au).



Dale Seymour  
Commissioner  
Anti-Dumping Commission

24 March 2016

<sup>14</sup> Available at [www.adcommission.gov.au](http://www.adcommission.gov.au).

<sup>15</sup> Where the Parliamentary Secretary publishes a dumping duty notice, that notice must include a statement of the ascertained normal value, ascertained export price and non-injurious price of the goods. The notice cannot specify different variable factors for different sub-sets of the goods. This reflects the Federal Court of Australia decision in *Panasia Aluminium (China) Limited v Attorney-General of the Commonwealth* [2013] FCA 870, which was handed down on 4 September 2013.

**Evidence relied upon**

The table below summaries the information submitted to the Commission by interested parties and the verification status of that information.

Interested party	Verification Status	Details
Applicant	Fully verified	The Commission has undertaken a verification visit to the applicant, Milltech, and is satisfied that the information it provided is relevant, accurate and complete. A verification visit report has been uploaded to the electronic public record.
Importers	Partially verified	<p>The Commission invited nine importers to complete an importer questionnaire. The Commission received four completed importer questionnaire responses from:</p> <ul style="list-style-type: none"> <li>• Intelloy Pty Ltd;</li> <li>• Van Leeuwen Pipe and Tube Pty Ltd;</li> <li>• Sanwa Pty Ltd; and</li> <li>• Nordon Cylinders.</li> </ul> <p>The Commission visited Interlloy, Van Leeuwen and Sanwa and the records of these visits are located on the electronic public record.</p>
Exporters	Partially verified	Refer to the above heading 5.1 for further details regarding exporter questionnaire responses received. The Commission has undertaken verification visits to all exporters. The Commission will publish visit reports on the public record during the course of this investigation.
Other interested parties	Considered	Prior to making this PAD, the Commission received and considered submissions from Valbrunna Australia Pty Ltd.