



**REVIEW 248**

**REVIEW OF ANTI-DUMPING MEASURES ON  
CERTAIN ALUMINIUM EXTRUSIONS**

**EXPORTED TO AUSTRALIA FROM  
THE PEOPLE'S REPUBLIC OF CHINA**

**VISIT REPORT - EXPORTER**

**GUANGDONG ZHONGYA ALUMINIUM COMPANY LIMITED  
ZHONGYA SHAPED ALUMINIUM (HK) HOLDING LIMITED**

**THIS REPORT AND THE VIEWS OR RECOMMENDATIONS CONTAINED THEREIN  
WILL BE REVIEWED BY THE CASE MANAGEMENT TEAM AND MAY NOT REFLECT  
THE FINAL POSITION OF ANTI-DUMPING COMMISSION**

**January 2015**

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## PUBLIC RECORD

### ABBREVIATIONS

\$	Australian dollars
ACBPS	Australian Customs and Border Protection Service
the Act	<i>Customs Act 1901</i>
Capral	Capral Limited
China	People's Republic of China
the Commission	Anti-Dumping Commission
the Commissioner	Anti-Dumping Commissioner
FOB	Free On Board
the goods	the goods the subject of the application (also referred to as the goods under consideration or GUC)
Guangdong Zhongya	Guangdong Zhongya Aluminium Company Limited
PanAsia	PanAsia Aluminium
the Parliamentary Secretary	the Parliamentary Secretary to the Minister for Industry and Science
SEF	Statement of Essential Facts
SOE	State owned enterprise
Tai Ao	Tai Ao (Taishan) Co Ltd
Zhongya HK	Zhongya Shaped Aluminium (HK) Holding Limited

## **1 BACKGROUND AND PURPOSE**

### **1.1 Existing measures**

On 11 May 2009, the Australian Customs and Border Protection Service (ACBPS) initiated dumping and subsidy investigations into certain aluminium extrusions exported from the People's Republic of China (China) following an application by Capral Limited (Capral). Trade Measures Report No. 148 (Report 148) found that:

- with the exception of Tai Ao (Taishan) Co Ltd (Tai Ao), the goods were exported from China at dumped prices;
- with the exception of Tai Ao, the goods exported from China were subsidised;
- the Australian industry producing like goods had suffered material injury as a result of those dumped and subsidised exports; and
- future exports from China may be dumped and subsidised and that continued dumping and subsidisation may cause further material injury to the Australian industry.

The ACPBS recommended that the then Minister for Home Affairs<sup>1</sup> impose anti-dumping measures on the goods exported from China, with the exception of Tai Ao. On 28 October 2010, the Minister published dumping duty and countervailing duty notices applying to aluminium extrusions exported to Australia from China, with the exception of Tai Ao. Notification of the Minister's decision was given in Australian Customs Dumping Notice No. 2010/40.

Following a review by the Trade Measures Review Officer, the ACBPS conducted a reinvestigation into certain findings made in Report 148. International Trade Remedies Report No. 175 sets out the findings affirmed and new findings made as a result of the reinvestigation. The Attorney-General published new notices, effective from 27 August 2011, which replaced the dumping and countervailing duty notices published on 28 October 2010. The effect of the new notices was that the level of the measures changed and the dumping duty notice no longer applied to Zhaoqing New Zhongya Aluminium Co Ltd, now called Guangdong Zhongya Aluminium Company Limited (Guangdong Zhongya).

### **1.2 Previous reviews**

On 2 November 2012, a notice was published declaring the outcome of a review of the anti-dumping measures as they apply to a single exporter, Wuxi Xisha Photoelectric Aluminium Products Co. Ltd. On 8 May 2014, the Parliamentary Secretary to the Minister for Industry (Parliamentary Secretary) published a notice following a review of anti-dumping measures as they apply to Alnan Aluminium Co., Ltd. Anti-dumping measures applicable to Alnan Aluminium Co., Ltd remained unaltered.

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<sup>1</sup> Prior to 25 September 2013, anti-dumping matters were the responsibility of the Minister for Home Affairs. On 25 September 2013, responsibility for anti-dumping matters was transferred to the Minister for Industry. The Minister for Industry subsequently delegated responsibility for anti-dumping matters to the Parliamentary Secretary to the Minister for Industry.

### **1.3 Background to the review**

On 2 May 2014, PanAsia Aluminium (PanAsia) lodged an application requesting a review of the anti-dumping measures as they apply to its exports of certain aluminium extrusions to Australia from China. PanAsia claims that certain variable factors relevant to the taking of the anti-dumping measures have changed.

The Commissioner of the Anti-Dumping Commission (the Commissioner) decided not to reject the application and initiated a review into the current anti-dumping measures, being both the dumping duty notice and the countervailing duty notice. The Commissioner also recommended that the Parliamentary Secretary be asked to extend the review to cover all Chinese exporters of aluminium extrusions to Australia. The Parliamentary Secretary accepted the Commissioner's recommendation and the review was extended to all exporters of the goods from China.

The Anti-Dumping Commission (Commission) invited Guangdong Zhongya to provide responses to a preliminary request for information in respect of the review. Guangdong Zhongya and its related entity Zhongya Shaped Aluminium (HK) Holding Limited (Zhongya HK) were included in the sample of exporters to be examined for the purposes of the review and the Commission requested Guangdong Zhongya and Zhongya HK complete exporter questionnaires and associated spreadsheets. Guangdong Zhongya and Zhongya HK subsequently provided a joint exporter questionnaire response. The Commission reviewed the response and considered it warranted verification.

### **1.4 Purpose of visit**

The purpose of the verification visit was to verify data and information contained in the exporter questionnaire response submitted by Guangdong Zhongya with respect to the value of subsidies received in the production and sale of the goods under consideration during the review period.

### **1.5 Meeting details**

Verification meetings were held on Wednesday 21 January 2015 at the offices of Guangdong Zhongya in Zhaoqing, Guangdong Province, China. Guangdong Zhongya was represented by Dowway & Partners, a Beijing based legal firm with previous experience in Australian anti-dumping investigations. Key representatives involved in the visit had good verbal English language comprehension and official translation services were not required. The following people were present at various stages of the meeting:

Guangdong Zhongya	Mr Harvey Ou, General Manager
Zhongya HK	Steven S.K. Chan, Manager
Consultants	Mr Jun (Frank) Zhang, Mr Jason Sun and Ms Yuanyuan Gao Dowway & Partners Law Firm Room 601, Scitech Tower No. 22 Jianguomenwai Avenue Beijing, China.
Anti-Dumping Commission	Chris Vincent – Assistant Director, Operations 1 Matthew Williams – Assistant Director, Operations 4

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Prior to the verification visit Guangdong Zhongya advised that it had found two corrections (explanations are at **Confidential Attachment GEN 1**). A revised sales summary is at **Confidential Attachment GEN 2**. Guangdong Zhongya also provided a revised Australian sales spreadsheet. We were able to incorporate the amendments into the Australian sales spreadsheet originally provided.

### **1.6 Investigation process and timeframes**

We advised Guangdong Zhongya of the following:

- the investigation period is April 2013 to March 2014.
- in October 2014, the Parliamentary Secretary granted an extension to the publication date for the statement of essential facts (SEF). In December 2014, the Parliamentary Secretary granted a further extension to the publication date for the SEF. The revised due date for the SEF is 29 April 2015.
- the SEF will set out the material findings of fact on which the Commission intends to base its recommendations to the Parliamentary Secretary. The SEF will invite interested parties to respond, within 20 days, to the issues raised.
- submissions received in response to the SEF will be considered when compiling the report and recommendations to the Parliamentary Secretary.
- the Commission's report to the Parliamentary Secretary is now due no later than 15 June 2014.
- the Parliamentary Secretary's decision is due within 30 days from the date of receipt of the final report, unless the Parliamentary Secretary considers there are special circumstances that prevent the decision being made within that period.

### **1.7 Visit report**

We explained that a report of the visit (this report) would be provided to Guangdong Zhongya and Zhongya HK to review its factual accuracy, and to identify those parts of the report it considers to be confidential.

It was explained that, in consultation with Guangdong Zhongya and Zhongya HK, we would prepare a non-confidential version of the report, and place this on the investigation's public record.

## 2 COMPANY INFORMATION

### 2.1 General

Guangdong Zhongya is a producer of aluminium extrusions in China. Its business scope is described in the notes to its audited financial statements for 2013 as manufacturing and selling (both home and abroad) new alloy materials, aluminium extrusions, aluminium products (aluminium tubes and sheets), aluminium windows and doors and accessories, aluminium plates and stainless steel products.

Guangdong Zhongya sells aluminium extrusions directly in the domestic market in China. All exports to Australia are made through Zhongya HK a related trading company in Hong Kong, whose principle activity is the trading of aluminium products.

### 2.2 Corporate, organisational and ownership structure

Guangdong Zhongya is a limited liability company and is ■% owned by Karlton Aluminium Company Limited (Karlton) and ■% by Zhongya HK. Karlton is a holding company established in Hong Kong making Guangdong Zhongya a wholly owned foreign enterprise.

A summary of the ownership arrangement is at **Confidential Attachment GEN 3**.

### 2.3 Accounting structure and details of accounting system

The accounting period for both Guangdong Zhongya and Zhongya HK is January to December.

Guangzhou Fangjiang Certified Public Accountants audited the 2013 Financial Accounts confirming the financial reports reasonably reflect the financial status and that the company conforms to the "Accounting Standards stipulation of Accounting Principles of Industry Enterprises" (**Confidential Attachment GEN 4**). Guangdong Zhongya stated that its accounting practices do not differ from the generally accepted accounting principles of China.

### **3 THE GOODS UNDER CONSIDERATION AND LIKE GOODS**

#### **3.1 The goods**

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

*Aluminium extrusions produced via an extrusion process, of alloys having metallic elements falling within the alloy designations published by The Aluminium Association commencing with 1, 2, 3, 5, 6 or 7 (or proprietary or other certifying body equivalents), with the finish being as extruded (mill), mechanical, anodized or painted or otherwise coated, whether or not worked, having a wall thickness or diameter greater than 0.5 mm., with a maximum weight per metre of 27 kilograms and a profile or cross-section which fits within a circle having a diameter of 421 mm.*

The goods include aluminium extrusion products that have been further processed or fabricated to a limited extent, after aluminium has been extruded through a die. For example, aluminium extrusion products that have been painted, anodised, or otherwise coated, or worked (e.g. precision cut, machined, punched or drilled) fall within the scope of the goods.

The goods do not extend to intermediate or finished products that are processed or fabricated to such an extent that they no longer possess the nature and physical characteristics of an aluminium extrusion, but have become a different product.

#### **3.2 Tariff classification of the goods**

The goods subject to the measures may be classified to the following subheadings in Schedule 3 of the *Customs Tariff Act 1995*:

7604.10.00/06	non alloyed aluminium bars, rods and profiles;
7604.21.00/07	aluminium alloy hollow angles and other shapes;
7604.21.00/08	aluminium alloy hollow profiles;
7604.29.00/09	aluminium alloy non hollow angles and other shapes;
7604.29.00/10	aluminium alloy non hollow profiles;
7608.10.00/09	non alloyed aluminium tubes and pipes;
7608.20.00/10	aluminium alloy tubes and pipes;
7610.10.00/12	doors, windows and their frames and thresholds for doors
7610.90.00/13	Other

Given the purpose of the visit was limited to countervailing only, we did not seek any additional comments with regard to goods or like goods.



## 4 SALES RECONCILIATION

### 4.1 General

Zhongya HK provided a copy of its audited financial statements for 2013 (**Confidential Attachment REC 1**) and a summary reconciling the sales value in the Australian sales spreadsheet to these audited financial statements (**Confidential Attachment REC 2**).

The audited accounts identified sales by customer in Hong Kong dollars (HKD). The summary identified sales in US dollars (USD). Zhongya HK stated that for accounting purposes it uses a fixed exchange rate of 7.75. The summary identified:

- monthly sales for 2013 that reconciled to the audited financial statements;
- monthly sales for the first quarter of 2014;
- total revenue for the investigation period;
- Australian and other country sales for the investigation period (Australian sales represented over ■% of total sales); and
- Australian sales of subject goods (about ■% of total Australian sales), non-subject goods and credit and debit notes (less than ■% of total Australian sales).

Total Australian sales of subject goods reconciled to the revised Australian sales spreadsheet.

Zhongya HK provided a monthly summary of sales by customer for 2013 the first quarter of 2014 (**Confidential Attachment REC 3**). The total for 2013 reconciled to the audited financial statements in HKD and the reconciliation summary in USD. The total to each country also reconciled to the audited financial statements. Total sales to Australia differed from the sales reconciliation summary. Zhongya HK advised that this was because a small volume of sales invoiced to an Australian customer were in fact delivered in China. The difference was less than ■%. Zhongya HK provided a line by line listing of sales to this customer. We selected a transaction and Zhongya HK provided an invoice which confirmed the sale was to an Australian customer, but delivered in China (**Confidential Attachment REC 4**).

Zhongya HK provided a monthly summary of non-subject goods by customer (**Confidential Attachment REC 5**). It also provided an electronic copy of all sales of non-subject goods during the investigation period identifying invoice number and description. We reconciled sales of non-subject goods in February 2014 to the monthly summary and verified selected shipments to invoices (**Confidential Attachment REC 6**).

We are satisfied that the sales information provided by Zhongya HK is complete and relevant.

## 5 SALES TO AUSTRALIA

### 5.1 Background

Australian customers raise purchase orders with Guangdong Zhongya, [REDACTED] [REDACTED] [confidential ordering arrangements], who then issues a commercial invoice to the Australian customer.

Zhongya HK uses an unrelated third-party trading company, [REDACTED] [REDACTED] to export the goods. [REDACTED] [confidential arrangement with trader]. This company is paid a commission and organises the VAT refund for the export sales.

Zhongya delivers the goods to the Australian customers and the Australian customers pay Zhongya HK.

Zhongya stated price negotiations differ from customer to customer.

For one customer there is no contract. The price of aluminium extrusions includes the price of aluminium ingots and processing expenses. The aluminium ingot price for the current month is [REDACTED] [REDACTED] [confidential pricing policy]. Processing expenses are [REDACTED] and are agreed by both the parties; they are not negotiated for every order.

For other customers, the price is determined by contract and other sales terms are determined by purchase order. A contract is signed between Zhongya HK and its customers [REDACTED] [commercial business arrangement] for a certain tonnage.

We noted that delivery terms in the Australian sales spreadsheet were FOB, but some invoices also identify ocean freight and insurance. We also noted that the FOB values from the invoices reconcile to the Australian sales spreadsheet. As we reconciled the values in the Australian sales spreadsheet to the audited financial statements we asked Zhongya how amounts for freight and insurance are captured in the audited financial statements.

Zhongya explained that the financial statements include income and cost of sales to determine the gross profit. Zhongya then recognises other income which includes bank interest, interest, compensation received and transportation income.

### 5.2 Verification to source documents

Zhongya provided an Australian sales spreadsheet that included a line by line listing of all sales of like goods to Australia during the investigation period. It provided documents supporting two transactions in its exporter questionnaire response. We selected a further six transactions for verification. Zhongya provided electronic copies of relevant documents to enable us to verify these six transactions to the Australian sales spreadsheet. The documents included:

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- purchase order;
- commercial invoice;
- packing list;
- bill of lading;
- documents supporting handling and other charges; and
- evidence of payment.

We verified the invoice value for like goods to the Australian sales spreadsheet. We are satisfied that the export sales data provided by Zhongya HK is accurate.

### **5.3 The exporter**

We have treated Guangdong Zhongya and Zhongya HK as a single entity. We consider the Zhongya Group to be the exporter as it:

- is the manufacturer of the goods;
- owned the goods at the time of export;
- is the principal in the transaction located in the country of export from where the goods were shipped that gave up responsibility by knowingly placing the goods in the hands of a freight forwarder for delivery to Australia; and
- sent the goods for export to Australia and was aware of the ultimate purchaser's identity.

### **5.4 The importer**

We consider that the Australian customers are the importers of the goods. The goods have been produced to the specifications nominated by the Australian customers and we consider the Australian customers to be the beneficial owners of the goods at the time of their arrival in Australia, and as such, are the importers of the goods. The Australian customers are named as the consignees on the bills of lading.

### **5.5 Arms' length**

In relation to the Zhongya Group's sales to its Australian customers, we found no evidence that:

- there is any consideration payable for in respect of the goods other than price;
- the price is influenced by a commercial or other relationship between the buyer, or an associate of the buyer, and the seller, or an associate of the seller; or
- the buyer, or an associate of the buyer, will, directly or indirectly, be reimbursed, be compensated or otherwise receive a benefit for, or in respect of, the whole or any part of the price.

We are satisfied that transactions between the Zhongya Group and its Australian customers are arm's length transactions.

### **5.6 Export price preliminary assessment**

Based on the information obtained at the visit we consider that:

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- that the goods have been exported to Australia otherwise than by the importer;
- that the goods have been purchased by the importer from the exporter; and
- the purchases of the goods were arms' length transactions.

Therefore, we consider that export prices for sales from the Zhongya Group to its Australian customers can be established under s. 269TAB(1)(a) using the invoiced price less amounts for post exportation expenses.

Export price calculations are at **Confidential Appendix 1**.

## 6 COUNTERVAILING

### 6.1 General

During the original investigation, the ACBPS found Guangdong Zhongya received countervailable subsidies in respect of programs 10, 13 and 15.

As part of the exporter questionnaire, Guangdong Zhongya was asked to provide responses regarding the 43 countervailable subsidies identified as part of the original investigation as well as 19 additional programs included as part of this review.

Guangdong Zhongya submitted that, during the review period, it was no longer in receipt of benefits under program 10 or program 15, however it has received benefits under two additional programs, programs 56 and 58 included as part of this review.

### 6.2 Previously applicable programs

#### 6.2.1 Program 10

In its exporter questionnaire response, Guangdong Zhongya stated that it did not receive a benefit under any preferential income tax programs during the review period and provided:

- a spreadsheet summarising its income tax liabilities for 2011, 2012 and 2013 (**Confidential Attachment SUB 1**); and
- income tax returns for 2011, 2012 and 2013 (**Confidential Attachment SUB 2**).

At the visit, Guangdong Zhongya stated that program 10 ceased to apply to reduce its tax liability from December 2012 as the 5 year qualification period had expired.

We reconciled the gross revenue reported in the 2013 income tax return to the audited financial statements for 2013. We note that the 2013 income tax return and income tax return for the first quarter of 2014 (**Confidential Attachment SUB 3**) did not report any tax offsets. Guangdong Zhongya also provided a proof of payment of its tax liabilities which confirmed that it paid tax at the rate of 25% during the review period (**Confidential Attachment SUB 4**).

We are satisfied that Guangdong Zhongya did not benefit from a preferential income tax program during the review period.

#### 6.2.2 Program 13

As part of its exporter questionnaire response, Guangdong Zhongya provided an imported asset schedule summary relating to benefits received under program 13 (**Confidential Attachment SUB 5**). Guangdong Zhongya stated that it had not imported any equipment since 2009 and that all assets acquired after 2009 had all been purchased from domestic manufacturers.

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The visit team noted that, during previous duty assessments in which Guangdong Zhongya was involved, the Commission verified Guangdong Zhongya's purchases of imported equipment. The visit team therefore sought to determine whether any additional imported equipment had been purchased during the review period only. The visit team examined the assets register from April 2013 to May 2014 and obtained a printout (**Confidential Attachment SUB 6**). We selected the most significant item purchased during the review period and asked to see the accounting voucher and invoice. These source documents confirmed that the purchase was not applicable to program 13. We are therefore satisfied that no additional imported equipment was purchased during review period. Copies of the accounting voucher and the invoice of the selected asset purchase are at **Confidential Attachment SUB 7**.

To support the details in the imported asset schedule, Guangdong Zhongya provided a summary of the tariff and import VAT exemptions, customs declaration forms, approval of exemption of import tax and VAT and applicable tariff and import rates, which form **Confidential Attachment SUB 8**.

On the basis of the above, we are satisfied that the benefit received by Guangdong Zhongya from program 13 has been accurately recorded.

### 6.2.3 Program 15

In its exporter questionnaire response, Guangdong Zhongya stated that it did not purchase aluminium ingots from state-owned enterprises (SOEs) during the review period and provided:

- details of its suppliers (**Confidential Attachment SUB 9**); and
- a detailed listing of its aluminium ingot purchases (**Confidential Attachment SUB 10**).

At the visit, to support its claim that the aluminium suppliers were not SOEs, Guangdong Zhongya provided company searches from the internet and local government municipality sites showing each supplier's ownership structure (**Confidential Attachment SUB 11**). The visit team's own internet research supported these claims.

To ensure that all aluminium purchases were captured in the aluminium purchases spreadsheet, the visit team asked Guangdong Zhongya to provide the aluminium purchase ledger from its system (**Confidential Attachment SUB 12**). We matched the total aluminium purchases shown in the aluminium purchases spreadsheet with the aluminium purchase ledger. Having done so, we are satisfied that the aluminium purchases spreadsheet is complete.

We reconciled the volumes and values for each supplier in the aluminium purchases spreadsheet to the aluminium purchase ledger. We are therefore satisfied that all suppliers of aluminium ingot to Guangdong Zhongya are identified.

To verify the accuracy of the aluminium purchases spreadsheet, we obtained copies of source documents (e.g. accounting entries, invoices and proof of payment) relating to one transaction from each of Guangdong Zhongya's suppliers during the review period (**Confidential Attachment SUB 13**). The visit team matched the volume and value of the

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selected aluminium purchases as listed in the aluminium purchase spreadsheet to the source documents.

Based on the aluminium purchase spreadsheet, we found that none of Guangdong Zhongya's aluminium purchases were from SOEs during the review period.

### 6.3 Preferential loans (program 44)

In its exporter questionnaire response, Guangdong Zhongya stated that it has not received any benefits under program 44 on the basis that its loans with state-owned controlled banks were at fair market conditions. To substantiate this claim, it provided evidence of its loans with overseas banks and the interest rates obtained by its parent company, Zhongya HK, in Hong Kong for the same period (**Confidential Attachment SUB 14**).

Guangdong Zhongya also provided a schedule of all loans obtained by the company (**Confidential Attachment SUB 15**) and contracts for loans outstanding at the end of the review period (**Confidential Attachment SUB 16**).

### 6.4 Provision of goods

In its exporter questionnaire response, Guangdong Zhongya stated that the land use rights it purchased from Zhaoqing Land and Resource Bureau as well as the electricity, water, natural gas and heavy oil it purchased from SOEs were at fair market price during the review period.

We collected source documents relevant to the provision of goods including:

- summary of land purchase and land contract;
- summary of electricity, water, natural gas and heavy oil purchases;
- ledgers from Guangdong Zhongya's accounting system;
- sample invoices; and
- sample proof of payment.

The abovementioned documents are at **Confidential Attachment SUB 17**.

### 6.5 Grants and preferential policies (programs 56 and 58)

In its exporter questionnaire response, Guangdong Zhongya stated that it benefited from grants under programs 56 and 58. As evidence of the grants it provided:

- application forms for the grants;
- proof of payment; and
- ledgers for entry of the grants in its non-operating income and financial expenses accounts.

The abovementioned documents are at **Confidential Attachment SUB 18**.

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For completeness, we obtained a copy of the subsidy income ledger for the review period, which did not reveal any additional subsidies or grants (**Confidential Attachment SUB 19**).

### 6.6 Capral submission

We discussed three additional subsidies raised by Capral in a submission on the public record dated 19 January 2014. Guangdong Zhongya stated that it has received no subsequent benefit under these programs, in particular:

- *Program 2: Grants for well-known trademarks and famous brands of China* was a once off benefit;
- *Program 49: Exemption from city construction tax and education tax for FIEs* relates to tax law which was terminated in 2011; and
- *Program 50: Refund of land use for firms located in the HDTDZ* was a one of refund of land use right fees which were incorrectly charged to Guangdong Zhongya in 2007.

### 6.7 Subsidy calculations

The Commission is in possession of sufficient information to calculate a countervailing margin for all programs examined, should the programs be determined to be countervailable.

The preliminary subsidy calculations are at **Confidential Appendix 2**.



**7 APPENDICES AND ATTACHMENTS**

<b>Confidential Appendix 1</b>	Export price calculations
<b>Confidential Appendix 2</b>	Preliminary subsidy calculations
<b>Confidential Attachment GEN 1</b>	Corrections
<b>Confidential Attachment GEN 2</b>	Revised export sales listing
<b>Confidential Attachment GEN 3</b>	Ownership structure
<b>Confidential Attachment GEN 4</b>	Guangdong Zhongya 2013 Audited Financial Statements
<b>Confidential Attachment REC 1</b>	Zhongya HK Audited Financial Statements
<b>Confidential Attachment REC 2</b>	Sales reconciliation
<b>Confidential Attachment REC 3</b>	Monthly sales by customer Jan to Mar 14
<b>Confidential Attachment REC 4</b>	Invoice for non-export sale
<b>Confidential Attachment REC 5</b>	Non-subject goods summary
<b>Confidential Attachment REC 6</b>	Non-subject goods invoices
<b>Confidential Attachment SUB 1</b>	Income tax summary
<b>Confidential Attachment SUB 2</b>	Income tax returns for 2011, 2012 and 2013
<b>Confidential Attachment SUB 3</b>	Income tax return Jan-Mar 2014
<b>Confidential Attachment SUB 4</b>	Proof of payment of income tax liability
<b>Confidential Attachment SUB 5</b>	Imported asset summary
<b>Confidential Attachment SUB 6</b>	Asset register for review period
<b>Confidential Attachment SUB 7</b>	Accounting voucher and invoice for sample asset purchase
<b>Confidential Attachment SUB 8</b>	Source documents for VAT and tariff
<b>Confidential Attachment SUB 9</b>	Suppliers of aluminium
<b>Confidential Attachment SUB 10</b>	Aluminium purchase summary
<b>Confidential Attachment SUB 11</b>	SOE ownership searches

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<b>Confidential Attachment SUB 12</b>	Aluminium purchase ledger
<b>Confidential Attachment SUB 13</b>	Source documents for aluminium purchases
<b>Confidential Attachment SUB 14</b>	Evidence of interest rates with foreign banks
<b>Confidential Attachment SUB 15</b>	Loan schedule for review period
<b>Confidential Attachment SUB 16</b>	Loan contracts
<b>Confidential Attachment SUB 17</b>	Source documents for provision of goods
<b>Confidential Attachment SUB 18</b>	Source documents for grants received
<b>Confidential Attachment SUB 19</b>	Subsidy income ledger