



Application for review of a Ministerial decision

Customs Act 1901 s 269ZZE

This is the approved¹ form for applications made to the Anti-Dumping Review Panel (ADRP) on or after 2 March 2016 for a review of a reviewable decision of the Minister (or his or her Parliamentary Secretary).

Any interested party² may lodge an application for review to the ADRP of a review of a ministerial decision.

All sections of the application form must be completed unless otherwise expressly stated in this form.

Time

Applications must be made within 30 days after public notice of the reviewable decision is first published.

Conferences

You or your representative may be asked to attend a conference with the Panel Member appointed to consider your application before the Panel gives public notice of its intention to conduct a review. Failure to attend this conference without reasonable excuse may lead to your application being rejected. The Panel may also call a conference after public notice of an intention to conduct a review is given on the ADRP website. Conferences are held between 10.00am and 4.00pm (AEST) on Tuesdays or Thursdays. You will be given five (5) business days' notice of the conference date and time. See the ADRP website for more information.

¹ By the Acting Senior Member of the Anti-Dumping Review Panel under section 269ZY *Customs Act 1901*.

² As defined in section 269ZX *Customs Act 1901*.

Further application information

You or your representative may be asked by the Panel Member to provide further information to the Panel Member in relation to your answers provided to questions 10, 11 and/or 12 of this application form (s269ZZG(1)). See the ADRP website for more information.

Withdrawal

You may withdraw your application at any time, by following the withdrawal process set out on the ADRP website.

If you have any questions about what is required in an application refer to the ADRP website. You can also call the ADRP Secretariat on (02) 6276 1781 or email adrp@industry.gov.au.

PART A: APPLICANT INFORMATION

1. Applicant's details

Applicant's name: **TIANJIN YOUFA STEEL PIPE GROUP CO.,LTD (Youfa)**

Address: **NO.33 BAIYIDAO,DAQUIZHUANG TOWN, JINHAI COUNTY, TIANJIN, CHINA PC301606**

Type of entity (trade union, corporation, government etc.): **corporation**

2. Contact person for applicant

Full name: **MR. WANG TAO**

MS. MU TONG

MR. ZHOU LEI

Position: **Legal counsel**

Email address: **wangtao@rayyinlawyer.com**

mutong@rayyinlawyer.com

zhoulei@rayyinlawyer.com

Telephone number: **+86 13501092768**

+86 15001062012

+86 18910276277

3. Set out the basis on which the applicant considers it is an interested party:

'Youfa' is a Producer and selected cooperative exporter of the goods

4. Is the applicant represented? YES

Youfa is represented by MR. JACK HOWARD OF STAUGHTONS.

Please see Letter of Authority.

If the application is being submitted by someone other than the applicant, please complete the attached representative's authority section at the end of this form.

****It is the applicant's responsibility to notify the ADRP Secretariat if the nominated representative changes or if the applicant become self-represented during a review.****

PART B: REVIEWABLE DECISION TO WHICH THIS APPLICATION RELATES

5. Indicate the section(s) of the *Customs Act 1901* the reviewable decision was made under:

Subsection 269TG(1) or (2) – decision of the Minister to publish a dumping duty notice

Subsection 269TH(1) or (2) – decision of the Minister to publish a third country dumping duty notice

Subsection 269TJ(1) or (2) – decision of the Minister to publish a countervailing duty notice

Subsection 269TK(1) or (2) decision of the Minister to publish a third country countervailing duty notice

Subsection 269TL(1) – decision of the Minister not to publish duty notice

Subsection 269ZDB(1) – decision of the Minister following a review of anti-dumping measures

Subsection 269ZDBH(1) – decision of the Minister following an anti-circumvention enquiry

Subsection 269ZH(1) – decision of the Minister in relation to the continuation of anti-dumping measures

6. Provide a full description of the goods which were the subject of the reviewable decision

certain electric resistance welded pipe and tube made of carbon steel, comprising circular and non-circular hollow sections in galvanised and non-galvanised finishes. The goods are normally referred to as either CHS (circular hollow sections) or RHS (rectangular or square hollow sections). The goods are collectively referred to as HSS (hollow structural sections). Finish types for the goods include in-line galvanised (ILG), Pre galvanised or hot-dipped galvanised (HOG) and non-galvanised HSS.

Sizes of the goods are, for circular products, those exceeding 21 mm up to and including 165.1 mm in outside diameter and, for oval, square and rectangular products those with a perimeter up to and including 950.0 mm. CHS with other than plain ends (such as threaded, swaged and shouldered) are also included within the goods coverage.

7. Provide the tariff classifications/statistical codes of the imported goods

Tariff code	Statistical code(s)
7306.30.00	31, 32, 33, 34, 35, 36, 37.
7306.50.00	45
7306.61.00	21, 22, 25, 90.
7306.69.00	10

7306.90.00	12
------------	----

8. Provide the Anti-Dumping Notice (ADN) number of the reviewable decision

If your application relates to only part of a decision made in an ADN, this must be made clear in Part C of this form.

057 - Notice - ADN 2018-74 Findings in relation to a review of measures

9. Provide the date the notice of the reviewable decision was published

6TH JUNE 2018

****Attach a copy of the notice of the reviewable decision (as published on the Anti-Dumping Commission's website) to the application****

COPY of NOTICE ADN No 2018/74 ATTACHED

Assistant Ministers Notice states the combined Fixed Rate of IDD and ICD for 'Tianjin Youfa' to be 10.4% which we consider to be correct (10.2% + 1.3%)

The Commission's Dumping Commodity Register however states the Fixed Rate to be 11.5% which we claim is incorrect.

PART C: GROUNDS FOR THE APPLICATION

If this application contains confidential or commercially sensitive information, the applicant must provide a non-confidential version of the grounds that contains sufficient detail to give other interested parties a clear and reasonable understanding of the information being put forward.

Confidential or commercially sensitive information must be marked '**CONFIDENTIAL**' (bold, capitals, red font) at the top of each page. Non-confidential versions should be marked '**NON-CONFIDENTIAL**' (bold, capitals, black font) at the top of each page.

For lengthy submissions, responses to this part may be provided in a separate document attached to the application. Please check this box if you have done so:

- 10. Set out the grounds on which the applicant believes that the reviewable decision is not the correct or preferable decision.**

RE DETAIL ON GROUND No 1, PLEASE REFER TO PARA 23, page 8 of separate Confidential document and FOR DETAIL ON GROUND No 2, PLEASE REFER TO PARA 50 page 18 of separate Confidential document

- 11. Identify what, in the applicant's opinion, the correct or preferable decision (or decisions) ought to be, resulting from the grounds raised in response to question 10.**

PLEASE REFER TO PARA 51 page 18 of separate Confidential document.

- 12. Set out the reasons why the proposed decision provided in response to question 11 is materially different from the reviewable decision.**

PLEASE REFER TO DETAIL ON TABLE No 9, page 18 of separate Confidential document.

Do not answer question 12 if this application is in relation to a reviewable decision made under subsection 269TL(1) of the Customs Act 1901.

PART D: DECLARATION

The applicant/the applicant's authorised representative [*delete inapplicable*] declares that:

- The applicant understands that the Panel may hold conferences in relation to this application, either before or during the conduct of a review. The applicant understands that if the Panel decides to hold a conference *before* it gives public notice of its intention to conduct a review, and the applicant (or the applicant's representative) does not attend the conference without reasonable excuse, this application may be rejected;
- The information and documents provided in this application are true and correct. The applicant understands that providing false or misleading information or documents to the ADRP is an offence under the *Customs Act 1901* and *Criminal Code Act 1995*.



Signature:

Name: J HOWARD

Position: REPRESENTATIVE

Organisation: STAUGHTONS

Date: 6/7/2018

PART E: AUTHORISED REPRESENTATIVE

This section must only be completed if you answered yes to question 4.

Provide details of the applicant's authorised representative

Full name of representative: Mr. Jack Howard

Organisation: Staughtons Pty.Ltd

Address:

Email address: jackhoward@itada.com.au

Telephone number: +61 459 21 2702

Representative's authority to act

****A separate letter of authority may be attached in lieu of the applicant signing this section****

The person named above is authorised to act as the applicant's representative in relation to this application and any review that may be conducted as a result of this application.



Signature

(Applicant's authorised officer)

Name: Mr. Li Shuhuan

Position: General Manager of Tianjin Youfa International Trade Co.,Ltd

Organisation Tianjin Youfa Steel Pipe Group Co., Ltd

Date: 3 / 7 / 2018

INTRODUCTION:

1. Based on relevant reports including the Anti-Dumping Commission's report titled 'Analysis of Steel and Aluminium Market 'of April 2106, our understanding of the purpose of Australia's Anti-Dumping and Countervailing system is to remedy material injury caused to Australian producers by 'dumped' and 'subsidised' imports and to provide the affected Australian producers an opportunity to truly compete with those imports on what is termed a level playing field.
2. However, as that report also stated, this does not mean the Australian system does, or should, have the effect of shielding Australian producers from vigorous competition as '*strong competitive pressures give industries incentive to continually improve their productivity performance and strive to **best meet their customers' needs***'. (Emphasis added)
3. The report in question was requested by the then Minister for Industry, Innovation, and Science and our clear conclusion from this and other reports including by the Productivity Commission is that the Australian anti-dumping system should only be applied to remedy material injurious effects of verified dumped /subsidised imports on affected Australian producers.
4. If, therefore, there is no actual material injury causation attributed to the imports, even when the imports in question were found to have been dumped or subsidised by the Anti-Dumping Commission, then in our opinion, the anti-dumping Commissioner has no valid basis for recommending that the Assistant Minister responsible for 'measures' impose any remedial measures on those exports.

5. Material injury is not defined in the *Customs ACT 1901 (ACT)* or, on our understanding, in any Ministerial direction for over the past 20 to 30 years.
6. The 'ACT' does however provide an explanatory outline on what the anti-dumping Commission **may** take into consideration when determining if the affected Australian producers (industry) have actually suffered material injury from the dumped or subsidised exports.
7. Those factors are outlined in subsection 269TAE(1) of the 'ACT' , one of which is stated to be the '***effect of the exportation of the goods in relevant economic factors in relation to the Australian industry.***'
8. The Australian industry in this case essentially comprises the following two producers: -
 - **ATM**-Austube Mills Pty Ltd. owned by the Liberty Onesteel Group (formerly Arrium/ONESTEEL) The applicant for this Review of Measures Case No 419)
 - **ORRCON**-ORRCON STEEL LIMITED, owned by Bluescope Steel.
9. Australia's only other producer of the 'goods in question' is **APT**- Australian Pipe & Tube which appears to be a low volume producer which did not engage with the Commission's investigation. Our market estimate of APT's sales volume is circa [REDACTED] tonnes.
10. The factor referred to in para 7 is effectively defined in subsection 269 TAE(3) of the 'ACT' in that effectively the term 'relevant economic factors in relation to the Australian industry' means taking into consideration various factors including the following:
 - Quantities of goods manufactured
 - Market share of the Australian industry
 - Capacity utilisation
 - Sales revenue of the goods

- Level of profits
- Return on investment and cash flow
- Number of flows
- Level of wages and terms of employment
- Level of investment in the industry

11.In terms of what factors the Assistant Minister, and thus the anti-dumping Commissioner, **must take** into consideration when determining injury and causation, subsection 269TAE(2) of the ‘ACT’, whilst providing a relatively open ended list of those other factors, two of those factors are:

- The volume /quantity and prices of like goods that are not dumped or subsidised, and in our opinion, the inclusion of like goods that have been and are dumped and subsidised but which the Commission, and thus the Assistant Minister, have determined to be non –injurious;
- Competition between the overseas and Australian producers of the goods.

12.Reasons for Ground No 1 on why we believe the reviewable decision is not the correct or preferable decision:

We need to make reference to the Commission’s Case No 320A on HSS exports from the UAE and INDIA which covered the importation period of 1/10/14 to 30/9/15 but which was only finally terminated on the 12th September 2017 –ADN No 2017/129 refers.

That case involved the exports from UAE and India of what was described as being ‘Galvanised CHS, and more specifically the product type Hot Dipped Galvanised circular pipe produced to Australian Standard 1074, a non-structural grade specification.

Para 4.6.1 of the Termination Report TER 320A stated the following:

'The Commission found that during the investigation period the majority of the HSS from India and the UAE were galvanised CHS, although the import volumes in Figure 1 above relate to all goods from these countries. ATM's volumes in Figure 1 specifically refer to galvanised CHS.'

Figure 1 referred to in para 4.6.1 is attached and illustrates that ATM's sales volumes are virtually 'zero' in the period 2014-2015.

Whilst the Termination Report TER 320A describes the goods in question as being 'galvanised CHS' it is reasonable to claim that based on the intimate market knowledge of 'Youfa's' Australian customers, the goods are actually Hot Dipped Galvanised CHS produced to the non – structural grade AS1074.

Para 4.6 3. of the Termination REPORT TER 320A stated the following:

'In the course of this resumed investigation, the Commission has examined the question: in the absence of dumping, could ATM have regained sales volumes held by exporters of dumped imports of galvanised CHS?'

The Commission has found that during the injury analysis period and in the investigation period, ATM did not regain sales volumes lost by the dumped goods from India and the UAE, and that these sales volumes were absorbed by exporters of undumped/de minimis dumped imports.'

ATM has claimed that buyers make purchasing decisions in the HSS sector on the basis of price and therefore dumped goods have a price advantage. However, the Commission has found that undumped galvanised CHS are the lowest priced goods in the market and that ATM sets its prices in reference to goods other than the dumped goods from India and the UAE.'

Based on the significant volume of other lower priced imports in the market, the Commission considers that there is no evidence to support the conclusion that ATM could have regained the sales volumes held by exporters of the dumped goods in the absence of dumping. Rather, the evidence before the Commission indicates that sales volumes lost by exporters of dumped goods was captured by suppliers of undumped imports into Australia.’

13. Conclusions

In the context of the factors outlined in subsection 269TAE(3) on the relevant economic factors in relation to the Australian industry and as outlined in previous para 10 , namely ;

- Quantities of HDG CHS Goods produced;
- ATM’s market share of HDG CHS;
- Sales Revenue of HDG CHS,

we claim that the Commission should have included this information in the report to the Assistant Minister and especially because of the requirement of subsection 269TAE(2) outlined in previous para 11.

14. RELEVANCE:

‘Youfa’ exported [REDACTED] of HSS product to Australia during this investigation period of July 2016 to June 2017 namely:

15. TABLE No 1 follows – ‘Youfa’ exports to Australia

TABLE No 1:

16. ‘YOUFA’ Export Sales to Australia:

Product Type	Australian Specification	Actual Tonnes exported	Invoiced FOB Value RMB	Commission’s Constructed Adjusted	Commission’s Calculated Dumping	% Dumping margins
--------------	--------------------------	------------------------	------------------------	-----------------------------------	---------------------------------	-------------------

--	--	--	--	--	--	--

17.CONCLUSIONS:

- 1. Confidential information**
- 2. Confidential information**

18. Supporting our claim that the HDGP CHS should be treated separately in the context of subsections 269TAE(2) and 269TAE(3) , AND as a result of the termination Report TER 320A, the following **TABLE No 2** outlining **the imports of CHS goods within the scope of this investigation for the investigation period of July 2016 to June 2017 is of relevance.**

TABLE No 2:

Country of export	Tonnes -rounded	A\$ FOB Value	A\$ FOB/tonne	Comments

Source: ‘

All other-ABS IMPORT CLEARANCE DATA

NCD = no country declared-origin not disclosed/restricted.

19. Table No 2 was presented to the Commission in the meeting of April 9th in Canberra.

20. It is our contention therefore that when determining its recommendation to the Assistant Minister, the anti-dumping Commission needed to take into consideration the relevant factors outlined in subsections 269TAE(2) and 269TAE(3) in the context of the real world factual situation and not on the basis of any self-interest claims of local producers which, in our opinion rely on the ‘like goods’ factor to effectively abuse their entitlement to Australia’s anti-dumping system.

21. Inherent in what we claim facilitates an apparent abuse of the system is the obvious reliance by both the Commission and the local producers, on the *Panasia Aluminium (China) Limited v Attorney General of the Commonwealth* {2103} FCA 870 decision that found all of the various finishes and types of HSS need to be treated as 'one' meaning that any sub-set of the HSS goods cannot be treated separately.

22. In effect, it is our contention that the applicant and its supporting local producer for this review of measures continue to claim that whilst neither has the obvious physical capability to produce a specific sub-set type of HSS GOODS, namely the imported hot dipped circular galvanized circular steel pipe (HDGP CHS), being of a non-structural grade specification (AS 1074), they clearly and obviously intentionally allow the HDGP in question to be included in the scope of like goods in this Commission's investigation, and despite the reality that both their associated distribution entities source imported HDGP from [REDACTED], [REDACTED], [REDACTED] and [REDACTED], they continue to claim the imported HDGP is a like good to what they can and do produce.

23. GROUND No 1 for why we believe the reviewable decision is not the correct or preferable decision:

Notwithstanding the ruling from the '*Panasia Case*', we believe the Commissioner of the Anti-Dumping commission was required to take into consideration the previous, relatively recent, findings in report TER 320A and regardless of this investigation being a review of measures, the Assistant Minister needs to be certain that measures are justified to remedy material injury caused to the local producers from the 'Youfa' exports and given the volume of the 'Youfa' exports were [REDACTED] [REDACTED] those exports need to be treated equally with those from [REDACTED], [REDACTED] etc., on the basis that whilst technically 'dumped' they cannot be the cause of injury to the local producers especially since no local producer has the physical capability to produce HDGP CHS in a truly commercial and competitive manner.

In effect, we believe that the apparent failure of the Commissioner to appraise the Assistant Minister of the matters referred to has more than likely denied the Assistant Minister of exercising his Ministerial discretion on the HDGP CHS exports [REDACTED]

FACTUALS:

24. What are not contentious at a factual level are the following features relating to the various 'Youfa' production entities that actually produced the export sales by the exporter 'Tianjin Youfa Trade International Co.Ltd.' during the investigation period.

25. As evidenced by Confidential **Table No 1**, para 16, the Commission's treatment and methodology on the [REDACTED] product 'types' exported to Australia involved;

- the construction of separate adjusted normal values;
- ascertaining separate FOB export values;
- and to determine separate normal values and dumping margins for each of the **four product types exported**, of which the contentious [REDACTED] was by far the volume product exported to Australia during the investigation period comprising [REDACTED]% by volume and [REDACTED]% by FOB Value.

PRODUCT PRODUCTION x Group Entity:

26. The 'Youfa' Group comprises a number of discreet legal entities but only some of which produced the goods exported to Australia by Tianjin Youfa International Trade Co Ltd. (the exporter)

27. We submit that only the actual 'Youfa' Production entities that produced the goods for the Australian sales should be taken into consideration for purposes of determining: -

28 - notional profit,

29 - and the Commission's foreign benchmark uplifted steel material input costs.

30. Submissions have been made to the Commission but [REDACTED] our claimed treatment and instead, has determined constructed and adjusted normal value factors based on entities that we claim xxx xx and in our opinion this has resulted in the decision being not the correct or preferable decision by reason that the dumping margin resulting from the Commission's treatment of the [REDACTED] [REDACTED] higher than it need be.

31. Annex A.3.5, and Annex A.3.10 of the submitted Exporter questionnaire details the various separate legal entities involved in the production, export processing and actual export of the goods to Australia. Each entity has its own Income TAX file number and reporting obligations as evidenced by the copy Tax returns provided the Commission in support of the export Questionnaire.

32. Table No 3 provides an outline on the relative Group entities, their function and individual Tax file number.

The purpose for providing this Table No 3 is to support our claim that whilst the Commission does not accept the China costs of production in regard to steel material input costs, the Commission when applying benchmark uplifts from foreign exporters –namely those from Korea and Taiwan, should [REDACTED] [REDACTED] to Australia. This affects the constructed adjusted normal values and thus the dumping duty margin and amounts, and in our case, specifically the dumping duty calculation on the [REDACTED]

33. Table No 3 follows:

TABLE No 3:

Group Entity	Function	Australian Goods Produced	Relevance to Grounds for Appeal	Tax File Number as per Copy Return to ADC

34. CONCLUSIONS:

- 1.
2. .
3. .

(confidential information)

35. The notional profit margin determined by the Commission for inclusion in the constructed, adjusted normal value was based on the following:

Table No 4: ADC profit calculations

Youfa entity	Profitability	Issue/Claim

The other ground for appeal that results from our Tables No 3 & 4 is our disagreement with the Commission’s uplifted steel material costs when applying benchmark HRC prices sourced from the Korean exporter, ‘Kukje’ and the Taiwan exporters ‘FEMCO’, ‘Shin Yang’ ‘Ursine Steel’ & ‘Ta Fong’. **We claim the benchmark [REDACTED] x produce [REDACTED] too high and does not adequately reflect the actual [REDACTED].**

36. As indicated in Table No 3, the 'Youfa' entity that produced the xxxx xxx (confidential)

37. The 'Youfa' produced [REDACTED] used to produce the Australian sales of [REDACTED] was produced from what is known as 'narrow strip' which the Commission acknowledged as being unique to China. As indicated previously, the [REDACTED] was produced to the non- structural grade Australian standard, AS 1074.

38. The 'Youfa' produced [REDACTED] was only produced for the Australian sales by the [REDACTED] from Hot Rolled Coil (HRC) and this was produced to the structural grade Australian standard AS 1163.

39. The concern we expressed to the Commission was that its benchmark uplifted steel material prices referred to in para 25, appeared to be problematic in that for quarters 2, 3, & 4, the uplifted costs for steel material appeared to be at odds with what we considered to be reported East Asian HRC prices from a reputable proprietary subscription service-[REDACTED].

40. One of the issues we put to the Commission in a meeting we had with [REDACTED] and [REDACTED] in the Commission's Canberra office on the [REDACTED] 2018 was the fact that none of the Korean or Taiwan exporters on which the benchmark prices were based actually produced [REDACTED] to [REDACTED] for export to Australia and nor would they have [REDACTED]. All of those exporters, on the best information available, produced the non -circular RHS/SHS for export to Australia being from either HRC for the painted RHS/SHS or from Zinc Coated Coil (galvanised) for the pre-galvanized RHS/SHS, both of which need to satisfy AS 1163. The China exporter 'Dalian Steelforce' also produces RHS/SHS to AS 1163 and does not produce HDGP CHS from 'narrow strip'.

41. The HRC used in production by the Korean and Taiwan exporters would need to have been of a structural grade compared to the xxx xxxxxxx [REDACTED] used to make [REDACTED] and in our opinion that is not a fair or equitable comparison.

42. Additionally, the use of galvanised steel to produce the pre-galvanised RHS/SHS, has a \$150 per tonne price premium on HRC according to the Australian applicant/producer ATM.

43. (confidential source on steel material prices)

44. TABLE No 5:

Table No 5 details the Commission’s Uplifted steel material INPUT costs for the [REDACTED] ‘Youfa’ [REDACTED] and are expressed as the RMB per unit/tonne value x Quarter. The Table also includes the uplifted prices referred to in para 33.

Entity	Q-SEPT 16	Q-DEC 16	Q-MARCH 17	Q-JUNE 17	4 Q WAV

45. Conclusions:

HRC pricing:
 (confidential information)

46. Relevant steel material purchases by ‘Youfa’ Entities.

Actual RMB per tonne purchase price:

TABLE No 6:

Entity	Steel Material	Q-Sept 16	Q-Dec 16	Q-March 17	Q-June 17	WAV-I.P.

TABLE No 7:

47. Total purchase value of the steel purchases being tonnes purchased by RMB unit price in Table No 4:

Entity	Q.1	Q.2	Q.3	Q.4	TOTAL VALUE	STEEL Material

48.CONCLUSIONS:

(confidential information)

49.CLAIMED UPLIFT VALUES FOR [REDACTED] produced by [REDACTED].

Table No 8.

REVISED REPLACEMENT COSTS FOR [REDACTED]
[REDACTED] - RMB/tonne

	Sept 16 q	Dec 16 q	March 17 q	June 17 q	COMMENT /REFERENCE

50. GROUND No 2 for Appeal:

The Commission has in our opinion erred in uplifting the input costs of steel narrow strip for the producers of [REDACTED], and most noticeably for [REDACTED]. We claim that there is a factual [REDACTED] in purchasing the [REDACTED] compared to purchasing [REDACTED] and that this cost benefit should only be determined by reference to the entities that actually produced goods for the Australian sales and as such the reviewable decision is not the correct or preferable decision.

51.In identifying what, in our opinion, the correct or preferable decision should be :

- An Interim Dumping duty rate of [REDACTED] %
- An interim Countervailing duty of [REDACTED] %

52. Table No 9 outlines what the dumping duty margin/amounts should be compared to the Commission's findings detailed in our Table No 1.

Table No 9

	AS SPEC	ACTUAL TONNES	RMB FOB VALUE	Claimed constructed Adjusted NV-RMB	Claimed Dumping duty amount	Claimed Dumping margin %

53. The outline in Table No 9 is what we believe we have submitted to the Commission and it is on the basis that further downward adjustment may be necessary due to :

(confidential information)

53. Explanation/Comments:

Generally, most of the foreign exporters of HSS product to Australia are a single legal entity having in-house separate Sales teams for Domestic sales and Export sales.

(confidential information)

.

.