




# Conference Summary

## Review No. 176 - Hot rolled deformed steel reinforcing bar in lengths exported from Malaysia, the Kingdom of Thailand, the Republic of Türkiye and the Socialist Republic of Vietnam

Panel Member	Jan Redfern PSM
Review type	Review of Minister's decision
Date	Wednesday 29 April 2026
Participants	Anti-Dumping Commission (ADC): 
Time opened	10:00am AEST
Time closed	12:00pm AEST

### Purpose

The Anti-Dumping Review Panel (Review Panel) opened the conference with an Acknowledgment of Country.

The purpose of this conference was to obtain further information in relation to the review before the Anti-Dumping Review Panel (Review Panel) in relation to Hot rolled deformed steel reinforcing bar in lengths exported from Malaysia, the Kingdom of Thailand, the Republic of Türkiye and the Socialist Republic of Vietnam

The conference was held pursuant to section 269ZZHA of the *Customs Act 1901* (the Act).

In the course of the conference, I was able to ask the ADC to clarify how it arrived at the dumping margin contained in its report, including the sampling referred to in pages 18-20 of the report. The conference was not a formal hearing of the review and was not an opportunity for parties to argue their case before me.

In accordance with section 269ZZHA(2), in making a recommendation under subsection 269ZZK(1), I may have regard to:

- (a) further information provided at this conference to the extent that it relates to “relevant information” within the meaning of section 269ZZK(6) of the Act;
- (b) any conclusions reached at this conference based on “that relevant information”.

At the time of the conference, I advised the participants:



**Australian Government**

**Anti-Dumping Review Panel**

- That the conference was being recorded and transcribed by Microsoft Teams (as facilitated by the Review Panel's Secretariat), and that the recording would capture everything said during the conference.
- That the conference was being recorded for the Review Panel to have regard to when preparing a conference summary. The conference summary would then be published on the Review Panel's website.
- Any confidential information discussed during the conference would be redacted from the conference summary prior to publication.

Prior to the conference, participants were provided with a copy of the Review Panel's Privacy Statement. The Privacy Statement outlines who the conference recording and transcript may be disclosed to. The Privacy Statement is available on the Review Panel's website [here](#). The participants indicated that they understood the Privacy Statement and consented to:

- The recording of the conference; and
- The recording being dealt with as set out in the Privacy Statement.

## Further information requested

The specific information that the Review Panel sought in this conference was the information set out in Annexure A. The ADC's responses to these questions are also contained in Annexure A.

I requested that the ADC provide additional information after the conference. The questions asked and the responses of the ADC are set out in Annexure B.



## ADRP 2026/176 – Hot rolled deformed steel reinforcing bar in lengths exported from Malaysia, the Kingdom of Thailand, the Republic of Türkiye and the Socialist Republic of Vietnam

ADRP Conference Wednesday 29 April 2026

*Written responses to request for further information*

### Introduction

On 24 April 2026, the Member requested the following further information for the conference on 29 April 2026, and indicated that the request would remain open for written responses:

1. *In relation to the sampling report (ADN 2025/014):*
  - a. *What information did the ADC rely on to reach the conclusion at Section 4 that Ann Joo and Southern Steel represented 76% of the exports from of exports from Malaysia and are responsible for the largest volume of goods exported into Australia from Malaysia that can reasonably be examined? What percentage did Southern Steel and Ann Joo each represent?*
  - b. *What information did the ADC rely on to reach the conclusion at Section 4 that HPHD (Hoa Phat) and VK Steel represented 87% of the exports from of exports from Vietnam and are responsible for the largest volume of goods exported into Australia from Vietnam that can reasonably be examined? What percentage did Hoa Phat and VK Steel represent?*
2. *How did the ADC calculate the dumping margins for each of the exporters for Malaysia referred to in Table 3 (Section 1.6.4) of Report No 655?*
3. *How did the ADC calculate the dumping margins for each of the residual exporters for Malaysia referred to in Table 3 (Section 1.6.4) of Report No 655, as particularised in fn16?*
4. *How did the ADC calculate the dumping margins for each of the exporters for Vietnam referred to in Table 3 (Section 1.6.4) of Report No 655?*
5. *How did the ADC calculate the dumping margins for each of the residual exporters for Vietnam referred to in Table 3 (Section 1.6.4) of Report No 655, as particularised in fn18?*

### Background

Although the Member's requests focus on (i) the information relied upon for the sampling conclusions in ADN 2025/014 (Requests 1a and 1b) and (ii) how dumping margins were calculated in Report No. 655 (Requests 2–5), the Commission provides the timeline and contextual information below to explain the investigation timeframes, extensions and verification workload that informed what could reasonably be examined within the statutory process.

The table below summarises key dates in the investigation, including the sampling report publication date and subsequent extensions to the SEF and Minister's report due dates. This chronology provides context for the timing of sampling and the verification activity undertaken in support of the SEF.

## PUBLIC RECORD

Day Count	Date	Event
<b>0</b>	<b>24-Sep-24</b>	<b>Initiation</b>
59	22-Nov-24	Extension of time [1] to SEF and Minister report due date (ADN 2024/095)
<b>110</b>	<b>12-Jan-25</b>	<b>Statutory SEF publication date</b>
<b>155</b>	<b>26-Feb-25</b>	<b>Statutory Minister report due date</b>
168	11-Mar-25	Sampling report publication date (ADN 2025/014)
293	14-Jul-25	Extension of time [2] to SEF and Minister report due date (ADN 2025/063)
314	4-Aug-25	SEF publication date (as extended) [1]
358	17-Sep-25	SEF publication date (as extended) [2]
358	17-Sep-25	Extension of time [3] to SEF and Minister report due date (ADN 2025/093)
377	6-Oct-25	Minister report due date (as extended) [1]
<b>393</b>	<b>22-Oct-25</b>	<b>SEF publication date (as extended) [3] [actual publication date]</b>
413	11-Nov-25	Due date for submissions to SEF (20 days after SEF)
421	19-Nov-25	Minister report due date (as extended) [2]
<b>450</b>	<b>18-Dec-25</b>	<b>Minister report due date (as extended) [3] [actual submission date]</b>

Insofar as the Member's questions touch on what exporters could reasonably be examined (including in the sampling decision) and the work undertaken to finalise calculations in the SEF, the Commission provides the following account of the investigation steps and verification activity reflected in the above chronology.

At the time the sampling report was finalised and published on 11 March 2025, the Commission assessed that up to eight exporters could be reasonably examined within the then-applicable investigation timetable. By that point, one exporter (PT Putra Baja Deli) had already been subject to a verification visit in Indonesia in December 2024, but that verification was not yet finalised at the time of publication of the sampling report. At that time, the SEF was due (as extended) by 4 August 2025.

Following the initial extension granted in November 2024 (ADN 2024/095), a further extension was granted in July 2025 (ADN 2025/063), moving the SEF due date to 17 September 2025. That extension accommodated the conduct of verification visits to one exporter each from Malaysia (Southern Steel), Thailand (Tata Steel) and Vietnam (VK Steel) through late May and June 2025 and the subsequent post visit work associated with the visits.

In September 2025, a further extension was granted (ADN 2025/093), moving the SEF due date to 22 October 2025. This extension accommodated completion of verification work concerning the 3 visits conducted in May–June, finalisation of the verification activities relating to Hoa Phat (Vietnam) and Ann Joo (Malaysia), and completion of the SEF. The verification phase was completed by early October 2025, and the SEF was published on 22 October 2025.

## PUBLIC RECORD

## ADRP Request 1a

1. In relation to the sampling report (ADN 2025/014):
  - a. What information did the ADC rely on to reach the conclusion at Section 4 that Ann Joo and Southern Steel represented 76% of the exports from of exports from Malaysia and are responsible for the largest volume of goods exported into Australia from Malaysia that can reasonably be examined? What percentage did Southern Steel and Ann Joo each represent?

## Response to Request 1

The commission relied on an examination of import volumes, in metric tonnes, contained in import declarations sourced from the Australian Border Force and the Australian sales volume reported in exporter questionnaire responses received by the commission from Malaysian exporters.

The volume of exports from Malaysia that was not covered by questionnaire responses received by the commission was alternatively based on the volume in import declarations within the tariff subheadings relevant to imports of the goods the subject of the investigation.

The figure of 76% outlined in the sampling report reflects the ratio of exports by Southern Steel and Ann Joo compared to the total volume determined for all other exporters from Malaysia [Confidential Info].<sup>1</sup>

The volume of goods exported to Australia by Southern Steel was [Confidential Info] tonnes. This figure was sourced from worksheet *B-2 Australian sales* to its questionnaire response.<sup>2</sup>

The volume of goods exported to Australia by Ann Joo was [Confidential Info] tonnes. This figure was sourced from worksheet *B-2 Australian sales* to its questionnaire response.<sup>3</sup>

Individually, Southern Steel represented [Confidential Info] % and Ann Joo represented [Confidential Info] % of all imports from Malaysia (based on the total of [Confidential Info]).<sup>4</sup>

The documents relevant to sampling assessment for Malaysia were provided to the ADRP Secretariat prior to the conference and are catalogued in the ADRP 2026/176 ADC Schedule of Documents as follows.

Item	File name
4.	655 Exporter Register (see worksheet sampling).xlsx
239.	655 – Ann Joo – exporter_questionnaire_-_dumping – SENSITIVE
822.	655 Southern Steel Attachment SSB EOR Worksheet – confidential

<sup>1</sup> See worksheet 'Sample Selection' at cell ref F32 in Document No. 4 '655 Exporter Register (see worksheet sampling).xlsx', ADRP 2026/176 ADC Schedule of Documents.

<sup>2</sup> Document No. 822 '655-Southern Steel-Attachment SSB EOR Worksheet – confidential', ADRP 2026/176 ADC Schedule of Documents.

<sup>3</sup> Document No. 239 '655 – Ann Joo – exporter\_questionnaire\_-\_dumping – SENSITIVE', ADRP 2026/176 ADC Schedule of Documents.

<sup>4</sup> See worksheet 'Sample Selection' at cell ref G25:G26 in Document No. 4 '655 Exporter Register (see worksheet sampling).xlsx', ADRP 2026/176 ADC Schedule of Documents.

## PUBLIC RECORD

## ADRP Request 1b

1. In relation to the sampling report (ADN 2025/014):
  - b. What information did the ADC rely on to reach the conclusion at Section 4 that HPHD (Hoa Phat) and VK Steel represented 87% of the exports from Vietnam and are responsible for the largest volume of goods exported into Australia from Vietnam that can reasonably be examined? What percentage did Hoa Phat and VK Steel represent?

## Response to Request 1b

The commission relied on an examination of import volumes, in metric tonnes, contained in import declarations sourced from the Australian Border Force and the Australian sales volume reported in exporter questionnaire responses received by the commission.

The volume of exports from Vietnam that was not covered by questionnaire responses received by the commission was alternatively based on the volume in import declarations within the tariff subheadings relevant to imports of the goods the subject of the investigation.

The figure of 87% outlined in the sampling report reflects the ratio of exports by Hoa Phat and Vina Kyoiei compared to the total volume determined for all other exporters from Vietnam [Confidential info].<sup>5</sup>

The volume of goods exported to Australia by Hoa Phat was [Confidential info] tonnes, as reported in worksheet *B-2 Australian sales* to its questionnaire response.<sup>6</sup>

The volume of goods exported to Australia by Vina Kyoiei was [Confidential info] tonnes, as reported in worksheet *B-2 Australian sales* to its questionnaire response.<sup>7</sup>

Individually, Hoa Phat represented [Confidential info]% and Vina Kyoiei represented [Confidential info]% of all imports from Vietnam (based on the total of [Confidential info]).<sup>8</sup>

The documents relevant to sampling assessment for Vietnam were provided to the ADRP Secretariat prior the conference and are catalogued in the ADRP 2026/176 ADC Schedule of Documents as follows.

Item	File name
4.	655 Exporter Register (see worksheet sampling).xlsx
428.	655-HAO PHAT HAI-Exhibit B.2 Australia Sales
1256.	655 - Vina Kyoiei - 655 - VKS - EQR - DUMPING WORKSHEETS

<sup>5</sup> See worksheet 'Sample Selection' at cell ref F55 in Document No. 4 '655 Exporter Register (see worksheet sampling).xlsx', ADRP 2026/176 ADC Schedule of Documents.

<sup>6</sup> Document No. 428 '655-HAO PHAT HAI-Exhibit B.2 Australia Sales', ADRP 2026/176 ADC Schedule of Documents.

<sup>7</sup> Document No. 1256 '655 - Vina Kyoiei - 655 - VKS - EQR - DUMPING WORKSHEETS', ADRP 2026/176 ADC Schedule of Documents.

<sup>8</sup> See worksheet 'Sample Selection' at cell ref G49:G50 in Document No. 4 '655 Exporter Register (see worksheet sampling).xlsx', ADRP 2026/176 ADC Schedule of Documents.

## PUBLIC RECORD

## ADRP Request 2

2. How did the ADC calculate the dumping margins for each of the exporters for Malaysia referred to in Table 3 (Section 1.6.4) of Report No 655?

## Response to Request 2

The dumping margins for Ann Joo and Southern Steel from Malaysia were determined by comparing export prices and corresponding normal values under section 269TACB of the *Customs Act*. Chapter 6.2.3 in REP 655 refers:

The export price for Ann Joo was determined under section 269TAB(1)(a) as outlined in chapter 6.8.1 of REP 655. The export price for Southern Steel was determined under either section 269TAB(1)(a) or section 269TAB(1)(c) as outlined in chapter 6.9.1 of REP 655

The normal values for Ann Joo and Southern Steel were determined under section 269TAC(1) of the *Customs Act* as outlined in chapters 6.8.2 for Ann Joo and 6.9.2 for Southern Steel in REP 655.

The calculations relied on for determining the export price, normal value and dumping margin in the case of Ann Joo were provided to ADRP Secretariat on 29 April 2026.

The attachments to REP 655 that are relevant to the calculation of the dumping margin for Ann Joo are catalogued in the ADRP 2026/176 ADC Schedule of Documents as follows.

Item	File name
15.	REP 655 Confidential Attachment 12 – Ann Joo Steel export price
16.	REP 655 Confidential Attachment 13 – Ann Joo Steel CTMS
17.	REP 655 Confidential Attachment 14 – Ann Joo Steel normal value
18.	REP 655 Confidential Attachment 15 – Ann Joo Steel dumping margin

The calculations relied on for determining the export price, normal value and dumping margin in the case of Southern Steel have not been provided to ADRP Secretariat. This was on the understanding that Southern Steel's variable factors were not used for determining the dumping margin for residual exporters from Malaysia. The relevant attachments to REP 655 are listed below and were provided to the ADRP Secretariat prior to the conference on 29 April 2026.

Item	File name
	REP 655 Confidential Attachment 16 – Southern Steel export price
	REP 655 Confidential Attachment 17 – Southern Steel CTMS
	REP 655 Confidential Attachment 18 – Southern Steel normal value
	REP 655 Confidential Attachment 19 – Southern Steel dumping margin

## PUBLIC RECORD

## ADRP Request 3

3. How did the ADC calculate the dumping margins for each of the residual exporters for Malaysia referred to in Table 3 (Section 1.6.4) of Report No 655, as particularised in fn16?

## Response to Request 3

The dumping margin for residual exporters from Malaysia was determined under section 269TACAB(2) of the Customs Act. Chapter 6.2.3 and 6.15 in REP 655 refers.

The export price for residual exporters from Malaysia is based on the export price determined Ann Joo as outlined in chapter 6.8.1 of REP 655.

The normal value for residual exporters from Malaysia is based on the normal value for Ann Joo as outlined in chapter 6.8.2 of REP 655.

The export price and normal value determined for Ann Joo were compared in the calculation set out for residual exporters in Confidential Attachment 40 to REP 655. See worksheet '*variable factors*' cell ref C9:L12

The attachments to REP 655 that are relevant to the calculation of the dumping margin for residual exporters from Malaysia are catalogued in the ADRP 2026/176 ADC Schedule of Documents as follows.

Item	File name
23.	REP 655 Confidential Attachment 40 – Residual and Uncooperative Exporters Dumping Margin

ADRP Request 4

4. How did the ADC calculate the dumping margins for each of the exporters for Vietnam referred to in Table 3 (Section 1.6.4) of Report No 655?

Response to Request 4

The dumping margins for Hoa Phat and Vina Kyoey from Vietnam were determined by comparing export prices and corresponding normal values under section 269TACB of the Customs Act. Chapter 6.2.3 in REP 655 refers

The export price for Hoa Phat was determined under section 269TAB(1)(a) as outlined in chapter 6.13.1 of REP 655. The export price for Vina Kyoey was determined under either section 269TAB(1)(a) or section 269TAB(1)(c) as outlined in chapter 6.14.1 of REP 655

The normal values for Hoa Phat and Vina Kyoey were determined under section 269TAC(1) of the Customs Act as outlined in chapters 6.13.2 for Hoa Phat and 6.14.2 for Vina Kyoey in REP 655.

The calculations relied on for determining the export price, normal value and dumping margin in the case of Vina Kyoey were provided to ADRP Secretariat on 29 April 2026.

The attachments to REP 655 that are relevant to the calculation of the dumping margin for Vina Kyoey are catalogued in the ADRP 2026/176 ADC Schedule of Documents as follows.

Item	File name
19.	REP 655 Confidential Attachment 36 – Vina Kyoey export price
20.	REP 655 Confidential Attachment 37 – Vina Kyoey CTMS
21.	REP 655 Confidential Attachment 38 – Vina Kyoey normal value
22.	REP 655 Confidential Attachment 39 – Vina Kyoey dumping margin

The calculations relied on for determining the export price, normal value and dumping margin in the case of Hoa Phat have not been provided to ADRP Secretariat. This was on the understanding that Hoa Phat’s variable factors were not used for determining the dumping margin for residual exporters from Vietnam. The relevant attachments to REP 655 are listed below and were provided to the ADRP Secretariat prior to the conference on 29 April 2026.

Item	File name
	REP 655 Confidential Attachment 5 – Hoa Phat arms length transaction assessment
	REP 655 Confidential Attachment 32 – Hoa Phat export price
	REP 655 Confidential Attachment 33 – Hoa Phat CTMS
	REP 655 Confidential Attachment 34 – Hoa Phat normal value
	REP 655 Confidential Attachment 35 – Hoa Phat dumping margin

## PUBLIC RECORD

## ADRP Request 5

5. How did the ADC calculate the dumping margins for each of the residual exporters for Vietnam referred to in Table 3 (Section 1.6.4) of Report No 655, as particularised in fn18?

## Response to Request 5

The dumping margin for residual exporters from Vietnam was determined under section 269TACAB(2) of the Customs Act. Chapter 6.2.3 and 6.15 in REP 655 refers.

The export price for residual exporters from Vietnam is based on the export price determined for Vina Kyoei as outlined in chapter 6.14.1 of REP 655.

The normal value for residual exporters from Vietnam is based on the normal value for Vina Kyoei as outlined in chapter 6.14.2 of REP 655.

The export price and normal value determined for Vina Kyoei were compared in the calculation set out for residual exporters in Confidential Attachment 40 to REP 655. See worksheet '*variable factors*' cell ref C23:L23

The attachments to REP 655 that are relevant to the calculation of the dumping margin for residual exporters from Vietnam are catalogued in the ADRP 2026/176 ADC Schedule of Documents as follows.

Item	File name
23.	REP 655 Confidential Attachment 40 – Residual and Uncooperative Exporters Dumping Margin

## PUBLIC RECORD



Australian Government  
Department of Industry,  
Science and Resources

## Anti-Dumping Commission

ADRP 2026/176 – Hot rolled deformed steel reinforcing bar in lengths exported from Malaysia, the Kingdom of Thailand, the Republic of Türkiye and the Socialist Republic of Vietnam

ADRP Conference Wednesday 29 April 2026

*Written responses to request for further information – 5 May 2026*

### Introduction

On 24 April 2026, the Member requested further information for the conference on 29 April 2026 and subsequently indicated that the request would remain open for written responses.

The Commission provided its initial written response on 1 May 2026 to the original five questions. This document provides written responses to the following additional questions requested on 30 April 2026:

*1. Can the ADC advise why it was decided not to include the exporters referred to below in the sample for the purposes of s 269TACAA of the Customs Act 1901 and, in particular, please provide an estimate of the impact on the timing and resources that would have been to include:*

*(a) Alliance*

*(b) Masteel*

*(c) VAS*

*and each of them individually in the sample for Malaysia or Vietnam (as the case may be).*

*2. Can the ADC give an estimate of the time and resources that would be required to include the exporters referred to in (1), if the dumping margins were to be reassessed at the time of this review.*

The Commission also filed its submissions pursuant to section 269ZZJ(aa) of the *Customs Act 1901* (Cth) on 30 April 2026, which was published by the ADRP on 1 May 2026.<sup>1</sup>

---

<sup>1</sup> <https://www.industry.gov.au/sites/default/files/adrp/2026-05/adrc-submission-adrp-review-176.pdf>

## ADRP Additional Request 1

1. Can the ADC advise why it was decided not to include the exporters referred to below in the sample for the purposes of s 269TACAA of the Customs Act 1901 and, in particular, please provide an estimate of the impact on the timing and resources that would have been to include:
  - (a) Alliance
  - (b) Masteel
  - (c) VASand each of them individually in the sample for Malaysia or Vietnam (as the case may be).

### Response to Request 1

As set out in the Commission's submissions, the sampling decision was made in accordance with s 269TACAA of the *Customs Act 1901* (Cth). At the relevant time, the Commission was satisfied that the exporters selected for Malaysia and Vietnam accounted for a sufficient proportion of exports to Australia to enable a proper and reliable examination of dumping.

Sampling is an express mechanism available under the Act. It does not require the Commission to examine every known exporter, nor to select the largest possible sample. Rather, it permits the Commission to select a sample that is reasonable and sufficient to meet the statutory task. The Commission considered that threshold was met by the sample selected.

As with all regulatory investigations, decisions as to sampling necessarily involve operational judgements regarding allocation of resources. Such allocation takes into account the entirety of statutory steps required to complete the investigation including: undertaking a public sampling selection process; early mandatory consideration of the need for a preliminary affirmative determination or in the alternative a status report; verifications to establish the accuracy and reliability of data and publication of verification reports; and delivery of a statement of essential facts to invite comment from interested parties followed by delivery of the final report including recommendations to the Minister, all within applicable timeframes. Those judgements are made in a way that ensures legislative requirements are met while enabling the Commission to discharge its functions across all active matters. This approach is consistent with the position set out in the Commission's submissions.

The exporters referred to formed part of the broader exporter population and were not disregarded. Their export volumes were considered when assessing the adequacy of sample coverage. However, their inclusion was not considered necessary to satisfy the statutory requirements, having regard to the volume already represented by the selected exporters and the Commission's assessment of what could reasonably be examined in the circumstances.

The Commission has considered what response is possible to the ADRP Member's question and does not consider that it can meaningfully and retrospectively quantify the impact on timing or resources of including additional exporters, either individually or collectively. However, by way of general context only, and not as an estimate for the purposes of this review:

- Where an exporter is selected for verification, undertaking a verification visit and completing the associated work would ordinarily require a minimum period in the order of several weeks, commonly around seven to eight weeks, taking into account preparatory work, examination, and follow-up analysis.

**PUBLIC RECORD**

- In practice, this period will likely involve a degree of interruption or extension due to factors such as aligning the availability of exporters to engage at times that align with Commission scheduling.
- The number of exporters that can reasonably be examined in any given investigation may also be informed by whether verification activities can be undertaken in parallel or must occur sequentially, and by the mode of verification adopted.
- Verification planning is informed by risk-based considerations that include but are not limited to factors such as export volumes and prices, the nature of the goods, technical aspect of an investigation, e.g. related parties, particular market situation allegations, and an exporter's prior interaction with the commission. In this investigation, the number of countries involved and the commoditised nature of the product resulted in a relatively high level of exporter interest.

These matters illustrate why verification effort and timing are not capable of precise or reliable reconstruction after the fact.

Accordingly, while this contextual information is provided to assist the Panel, the Commission's position remains that the review turns on the proper construction and application of the statutory framework, as addressed in its submissions, rather than on retrospective assessment of operational alternatives or after-the-event quantification exercises.

## PUBLIC RECORD

## ADRP Additional Request 2

2. Can the ADC give an estimate of the time and resources that would be required to include the exporters referred to in (1) if the dumping margin were to be reassessed as at the time of this review.

## Response to Request 2

The exporters referred to have already provided all their relevant information. Therefore, the remaining work would involve verification of that information and updating the associated dumping margin analysis. While the Commission can provide general guidance as to the nature and scale of that work, any assessment remains indicative only and subject to operational contingencies. For completeness, we note that, having regard to the scope of verification and analysis involved, we do not consider that such work could be undertaken within the current timeframe of the ADRP review.

By way of general context:

- Where an exporter has already provided information, verification of that information and completion of the associated analysis would ordinarily require a period of several weeks, commonly in the order of six to eight weeks for an on-site visit. This would encompass verification planning, resolution of verification findings, preparation of a report and associated analysis documents and the dumping margin calculations.
- In circumstances where the commission is unable to visit an exporter, due to the exporter's availability, the commission's broader verification schedules, or a combination of the two, the commission may rely on an alternative approach such as a comparative analysis. This usually requires benchmarking to other exporter's data that has been fully verified by way of a visit to that other exporter from the same country. This process was adopted during Investigation 655 for Ann Joo and Hoa Phat and was contingent on the conduct of a full visit to Southern Steel and VK Steel in Malaysia and Vietnam. This process shortens the duration of a verification task overall as it does not involve the visit component. However, it otherwise includes several verification procedures that would be performed for a full on-site visit. This alternative approach may also still involve numerous interactions with the exporter if the commission finds it necessary to obtain information in addition to what is provided by an exporter in its questionnaire response.
- The duration of a verification, whether it be an on-site visit or adopting alternative approaches, may be affected by factors such as the commission's broader verification schedules, and the availability of exporters to engage in verification activities in accordance with Commission scheduling.
- The number of exporters that can reasonably be verified within a given period may depend on whether verification activities can be undertaken in parallel or must occur sequentially, and on the verification modality adopted.
- Verification planning is informed by risk-based considerations that include but are not limited to factors such as export volumes and prices, the nature of the goods, technical aspect of an investigation, e.g. related parties, particular market situation allegations, and an exporter's prior interaction with the commission, including export volumes and the nature of the goods.

This information is provided to give the Panel an understanding of the scale and nature of the investigative effort that would be involved.