



Australian Government
Anti-Dumping Commission

CUSTOMS ACT 1901 - PART XVB
ANTI-DUMPING COMMISSION

CONSIDERATION REPORT
NO. 254

APPLICATION FOR
A DUMPING DUTY NOTICE

CERTAIN HOLLOW STRUCTURAL SECTIONS
EXPORTED FROM THE KINGDOM OF THAILAND

14 July 2014

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ABBREVIATIONS AND SHORTENED FORMS

Abbreviation and shortened forms	Full reference
ACBPS	Australian Customs and Border Protection Service
the Act	<i>Customs Act 1901</i>
the applicant	Austube Mills Pty Ltd
ATM	Austube Mills Pty Ltd
China	People's Republic of China
CHS	circular hollow sections
the Commission	Anti-Dumping Commission
the Commissioner	Commissioner of the Anti-Dumping Commission
CON 254	Anti-Dumping Commission Consideration Report 254
FOB	free-on-board
the goods	the goods the subject of the application (certain hollow structural sections)
HDG	hot-dipped galvanised
HRC	hot-rolled coil
HSS	certain hollow structural sections
██████ Report	██████ Business Consulting report 'Market Study – HRC & HSS in Thailand', dated 15/11/2013
██████	██████ [steel market data provider]
ITM	Independent Tube Mills Pty Ltd
Korea	Republic of Korea
the Minister	Minister for Industry
MT	metric tonne
Orrcon	Orrcon Operations Pty Ltd
Parliamentary Secretary	Parliamentary Secretary to the Minister for Industry
REP177	International Trade Remedies Branch Report No.177 – certain hollow structural sections from the People's Republic of China, the Republic of Korea, Malaysia, Taiwan and Thailand
RHS	rectangular and square hollow sections
Thailand	Kingdom of Thailand
THB	Thai Baht

1 SUMMARY AND RECOMMENDATIONS

1.1 Background

This Consideration Report No. 254 (CON 254) provides the results of the Anti-Dumping Commission's (the Commission's) consideration of an application lodged by Austube Mills Pty Ltd (ATM) for the publication of a dumping duty notice on certain hollow structural sections¹ (HSS) exported to Australia from the Kingdom of Thailand (Thailand).

1.2 Recommendations

The Commission recommends that the Anti-Dumping Commissioner (the Commissioner) not reject the application.

If the Commissioner accepts this recommendation, to give effect to that decision, the Commissioner must publish the notice at **Attachment 1** indicating that the Commission will inquire into whether the grounds exist to publish a dumping duty notice.

1.3 Application of law to facts

Division 2 of Part XVB of the *Customs Act 1901* (the Act)² sets out procedures for considering an application for a dumping duty notice.

1.4 The role of the Commission

The Commission is responsible for preparing a report for the Commissioner examining an application for a dumping duty notice.

In this report, the following matters are considered in relation to the application:

- whether the application complies with subsection 269TB(4) of the Act;
- whether there is, or is likely to be established, an Australian industry in respect of like goods; and
- whether there appear to be reasonable grounds for the publication of a dumping duty notice in respect of the goods the subject of the application.

1.5 The role of the Commissioner

The Act empowers the Commissioner, after having regard to the Commission's report, and to any other information that the Commissioner considers relevant, to reject or not reject an application for the publication of a dumping duty notice.

If the Commissioner decides not to reject the application, the Commissioner must give public notice of the decision providing details of the investigation.

¹ Refer to the full description of the goods in Section 2.2.1 of this report.

² All references in this report to sections of legislation, unless otherwise specified, are to the *Customs Act 1901*.

1.6 Findings and conclusions

The Commission has examined ATM's application and is satisfied that:

- the application complies with the requirements of subsection 269TB(4) of the Act (as set out in Section 3 of this report);
- there is an Australian industry in respect of like goods (as set out in Section 4 of this report);
- there appear to be reasonable grounds to conclude that exports of HSS from Thailand have been at dumped prices (as set out in Section 5 of this report);
- the Australian industry producing like goods appear to have experienced injury (as set out in section 6 of the report) from dumped imports (as set out in section 7 of this report); and
- there appear to be reasonable grounds to publish a dumping duty notice in respect of the goods the subject of the application.

2 BACKGROUND

2.1 Application

On 10 June 2014, ATM lodged an application requesting that the Minister for Industry (the Minister) publish a dumping duty notice in respect to HSS exported to Australia from Thailand.³

ATM alleges that the Australian industry has suffered material injury caused by HSS exported to Australia from Thailand at dumped prices. ATM claims that material injury in respect of HSS commenced in June 2012 following the imposition of anti-dumping measures on exports from the People's Republic of China (China), the Republic of Korea (Korea), Malaysia and Taiwan. ATM identified the injurious effects as:

- lost sales volumes;
- lost market share;
- price depression;
- price suppression;
- reduced profit;
- reduced profitability;
- reduced capital investment;
- reduced research and development expenditure;
- reduced return on investment;
- reduction in capacity utilisation for like goods;
- write-down of goodwill associated with the HSS business;
- reduction in employment levels; and
- reduced attractiveness to re-invest.

2.2 The goods the subject of the application

2.2.1 Description

The goods the subject of this application (the goods), are:

Certain electric resistance welded pipe and tube made of steel, comprising circular and non-circular hollow sections in galvanised and non-galvanised finishes, whether or not including alloys. 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

³ On 16 September 2013, the Minister for Industry delegated responsibility for anti-dumping matters to the Parliamentary Secretary to the Minister for Industry.

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for the goods include pre-galvanised, hot-dipped galvanised (HDG), 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.

ATM submit that the following categories of HSS are excluded from the application:

- *conveyor tube made for high speed idler rolls on conveyor systems, with inner and outer fin protrusions removed by scarfing (not exceeding 0.1mm on outer surface and 0.25mm on inner surface), and out of round standards (i.e. ovality) which do not exceed 0.6mm in order to maintain vibration free rotation and minimum wind noise during operation);*
- *precision RHS with a nominal thickness of less than 1.6 mm (i.e. not used in structural applications); and*
- *stainless steel CHS and RHS sections.*

The goods covered by this application include all electric resistance welded pipe and tube made of steel meeting the above description of the goods (and exclusions), regardless of whether or not the pipe or tube meets a specific structural standard or is used in structural applications.

2.2.2 Tariff classifications

The application stated that the goods are classified under the following tariff classifications and statistical codes:

- *7306.30.00 (statistical codes 31, 32, 33, 34, 35, 36 and 37);*
- *7306.50.00 (statistical code 45);*
- *7306.61.00 (statistical codes 21, 22, 25 and 90); and*
- *7306.69.00 (statistical code 10).*

Based on information provided in the application, Australian Customs and Border Protection Service (ACBPS) Tariff Policy and Implementation Branch confirmed that the goods are correctly classified to tariff subheadings:

- 7306.30.00: circular hollow sections;
- 7306.61.00: rectangular or square hollow sections;
- 7306.69.00: other non-circular cross-sections; and
- 7306.50.00: other circular cross-sections of other alloys of steel,

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

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The goods exported to Australia from Thailand under the Thailand Free Trade Agreement are free from duty as of 1 January 2010.⁴

The Commission notes that there are numerous Tariff Concession Orders applicable to the relevant tariff subheadings.

2.3 Previous investigations

Several investigations, (including reinvestigations, reviews and continuation inquiries) have been conducted into HSS and specific sub-categories of the goods exported from various countries over a number of years.

The more recent of these investigations are discussed in **Attachment 2**.

2.4 Current measures: Report No. 177

On 19 September 2011, ACBPS initiated an investigation into the alleged dumping of HSS exported to Australia from China, Korea, Malaysia, Taiwan and Thailand and the alleged subsidisation of HSS exported from China.

On 6 June 2012, ACBPS terminated the countervailing investigation in so far as it related to the Chinese exporters Huludao City Steel Pipe Co., Ltd and Qingdao Xiangxing Steel Pipe Co., Ltd, and terminated the dumping investigation into Thailand.

As a result of its investigation, ACBPS recommended to the then Minister for Home Affairs that:

- HSS exported from China, Korea, Malaysia and Taiwan had been dumped;
- HSS exported from China incurred a benefit from the receipt of countervailable subsidisation; and
- the Australian industry manufacturing like goods had suffered material injury as a result.

These recommendations were contained in International Trade Remedies Branch Report No.177 – certain hollow structural sections from the People's Republic of China, the Republic of Korea, Malaysia, Taiwan and Thailand (REP177).

A dumping duty notice in respect of goods exported from China, Korea, Malaysia and Taiwan and a countervailing duty notice in respect of goods exported from China was published on 3 July 2012.

2.5 Investigations by other administrations

The Canada Border Services Agency initiated an investigation into the alleged dumping of certain carbon welded pipes from Thailand (and other nominated

⁴ The Thailand-Australia Free Trade Agreement came into effect on 1 January 2005. Full text of the agreement is available at https://www.dfat.gov.au/fta/tafta/tafta_toc.html

countries) which resulted with imposition of anti-dumping duties for Thai exporters in December 2012.⁵ This is discussed further at section 7.11 of this report.

2.6 Consideration of the application

Under subsection 269TC(1) of the Act, the Commissioner shall examine the application and, within 20 days from the date of lodgement, decide whether or not to reject the application. Under subsection 269TC(2A), if an applicant, after lodging an application, decides to give further information to support its application, the additional information has the effect as if the application was lodged at the time of the provision of the additional information and the 20-day consideration period recommences.

On 24 June 2014, ATM provided additional information to support its application. As a result, the application consideration period recommenced and the final decision date was extended to **14 July 2014**.

Subsection 269TC(1) of the Act specifies that the Commissioner shall reject an application if the Commissioner is not satisfied that:

- the application complies with subsection 269TB(4); or
- there is, or is likely to be established, an Australian industry in respect of like goods; or
- there appear to be reasonable grounds for the publication of a dumping duty notice in respect of the goods the subject of the application.

The above matters are examined in the following sections of this report.

⁵ Canada Border Services Agency Dumping case number AD/1396. Additional information is available at <http://www.cbsa-asfc.gc.ca/sima-lmsi/i-e/ad1396/ad1396-i12-nf-eng.html>

3 COMPLIANCE WITH SUBSECTION 269TB(4)

3.1 Finding

Based on the information provided in the application, the Commission is satisfied that the application complies with subsection 269TB(4) of the Act.

3.2 Legislative framework

Subsection 269TB(4) requires that the application must:

- be in writing; and
- be in an approved form; and
- contain such information as the form requires; and
- be signed in the manner indicated by the form; and
- be supported by a sufficient part of the Australian industry.

3.3 Approved form

The application is in writing, is in the approved form (a B108 application form), contains such information as the form requires (as discussed in the following sections of this report) and is signed in the manner indicated in the form.

ATM submitted confidential and public record versions of the application along with numerous appendices and attachments.

The Commission considers that the public record version of the application contains sufficient detail to allow a reasonable understanding of the substance of the information in the confidential version of the application.

3.4 Supported by the Australian industry

An application is taken to be supported by a sufficient part of the Australian industry if the persons who produce or manufacture like goods in Australia and who support the application:

- account for more than 50% of the total production or manufacture of like goods by the proportion of the Australian industry that has expressed either support for or opposition to, the application; and
- account for not less than 25% of the total production or manufacture of like goods in Australia.

Within its application, ATM identified the following other Australian producers of HSS:

- Orrcon Operations Pty Ltd (Orrcon); and
- Independent Tube Mills Pty Ltd (ITM).

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The application includes ATM's production volumes for the 2013/14 year ending March.⁶ It also includes estimates of production volumes for the same period for the two entities that ATM claim are the only other HSS manufacturers in Australia, Orrcon and ITM.

Neither Orrcon nor ITM are a party to the application and the application contains no indication of whether Orrcon or ITM support or oppose the application.

In its application, ATM submitted its production volume for the 2013/14 year ending March and estimated Orrcon and ITM's production volumes. The Commission noted that, based on this data, ATM alone stands for ■■■% of Australian production volume.

The estimates of production volumes of Orrcon and ITM supplied by the applicant are broadly consistent with verified information from the most recent HSS investigation (REP177). Based on the information provided, the Commission considers the application is supported by a sufficient part of the Australian industry.

⁶ References in this report to years, unless specified otherwise, are years ending March.

4 LIKE GOODS AND THE AUSTRALIAN INDUSTRY

Subsection 269TC(1) of the Act requires that the Commissioner must reject an application for a dumping duty notice if, inter alia, he is not satisfied that there is, or is likely to be established, an Australian industry in respect of like goods.

4.1 Locally produced like goods

Subsection 269T(1) defines like goods as:

goods that are identical in all respects to the goods under consideration or that, although not alike in all respects to the goods under consideration, have characteristics closely resembling those of the goods under consideration.

4.1.1 Applicant's claims

ATM's application relies on ACBPS' previous findings in REP116, REP144, REP153 and REP177 (see attachment 2 for a discussion of each of these cases) in asserting that HSS manufactured in Australia are 'like goods' to imported HSS from Thailand.

ATM claims that the Australian industry manufactures a wide variety of HSS in a multitude of shapes and profiles in various finishes.

ATM claims that it manufactures and supplies painted, black and hot dipped galvanised (HDG) HSS to the Australian market

[REDACTED]

[REDACTED]. [details about production process]
ATM claims that Orrcon manufactures and supplies painted, black, pre galvanised and electro galvanised finished HSS and that ITM manufactures and supplies black, painted and pre galvanised HSS.

ATM refers to determinations in REP177 that:

"Australian HSS competes directly with imported goods in the Australian market, has identical or comparable end-uses and is manufactured in a similar manner to the imported goods, remain appropriate."

In support of its claims, the applicant submitted a product brochure listing the types of HSS produced and sold by ATM.

4.1.2 The Commission's assessment

Based on the information provided in the application and having regard to the findings of previous HSS dumping/subsidisation investigations,⁷ the Commission is satisfied the applicant has demonstrated that:

- the physical characteristics of imported and locally produced HSS are similar;

⁷ Including in particular, Investigation Report No. 177 and Termination Report No. 177

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- the imported and locally produced HSS are commercially alike as they are sold through the same distribution channels to common end users;
- the imported and locally produced HSS are functionally alike as they have the same end-uses; and
- the imported and locally produced HSS are manufactured in a similar manner.

The Commission is therefore satisfied that there is an Australian industry producing like goods to the goods the subject of the application.

4.2 Manufactured in Australia

The Commissioner must also be satisfied that the 'like goods' are in fact produced in Australia. Subsections 269T(2) and 269T(3) of the Act specify that for goods to be regarded as being produced in Australia, they must be wholly or partly manufactured in Australia. In order for the goods to be considered as partly manufactured in Australia, at least one substantial process in the manufacture of the goods must be carried out in Australia.

This issue is examined in Sections 4.2.1 and 4.2.2 below.

4.2.1 Manufacturing process

In its application, ATM describes its HSS manufacturing process as follows:

- raw material feed hot-rolled coil (HRC) (including pre-galvanized HRC) is purchased from suppliers;
- the HRC is loaded into a slitter and uncoiled then slit to various widths, edges trimmed, then re-rolled into smaller slit coils ready for use in the pipe and tube mills;
- the coil is then loaded into an accumulator where it is unrolled and fed into a mill for formation into pipe and tube (as the loaded coil ends, the following coil is butt welded to the preceding coil, and the accumulator allows a continuous flow of coil into the production process);
- the slit coil is then formed through a series of rollers into a circular pipe. The pipe is welded along the seam, using an electric resistance welding process, into a continuous hollow round tubular shape;
- the round tubular pipe is then further formed through rollers into square, rectangular and other shapes/cross sections as required (or left circular);
- the product is surface finished by applying various protective coatings such as paint, varnish, oil or galvanising. HSS made from pre-galvanized HRC is repair galvanized along the weld line;
- the HSS is date and time stamped, cut to length, bundled and placed in racks ready for storage or despatch to customers;
- the ends of the bundled HSS are painted with a colour code to identify its gauge (wall thickness); and

[redacted] [confidential]
information about a production process]

ATM's production schema is in **confidential attachment 3**.

4.2.2 The Commission's assessment – manufacturing process

Based on the description and the production schema provided by ATM of its HSS manufacturing processes in its application, and the Commission's knowledge of the industry from previous HSS dumping/subsidisation investigations,⁸ the Commission is satisfied that at least one substantial process of manufacture is performed by ATM in Australia and, therefore, that the goods may be taken to have been produced in Australia.

4.3 Australian market

4.3.1 Market size

ATM claims that the Australian market for HSS is supplied from local production (i.e. ATM, Orrcon and ITM) and imports (including from Thailand, China, Korea, Malaysia and Taiwan).

In its application, ATM agrees with the estimation of the size of the Australian market for HSS as being approximately 500,000 tonne as specified in REP177 for 2011/12 period.

The applicant provided its estimate of the size of the Australian market for HSS at Appendix A2 of the application and summarised indexed movements in the market in Section A4 of the application. Data was provided for annual periods ending in March for 2010/11, 2011/12, 2012/13 and 2013/14.

Figure 1 depicts movement in the Australian market for the period April 2010 to March 2014.

⁸ Investigation Report No. 177, Review Report No. 153, Continuation Inquiry No. 147, Investigation Report No. 144, Review Report No. 143 and Investigation Report No. 116

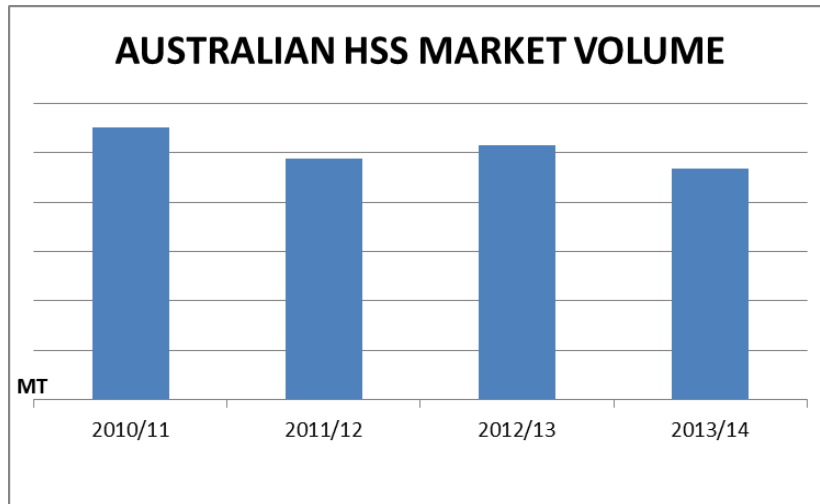


Figure 1: Australian HSS market volume

ATM's estimate of sales values and volumes for Orrcon is based upon analysis contained in REP177 which indicated that ATM and Orrcon's combined share of locally produced sales exceeded [REDACTED] per cent. ITM are understood to account for the balance.

ATM submitted that its estimated HSS import volumes are based on [REDACTED] [source of HSS export data] export statistics and [REDACTED] [source of HSS export data] export data. ATM notes that for the 2013/14 period, the export data for all countries but Thailand is actual data to February 2014 and is pro-rated to the end of March. This represents 11 months of the 12 month investigation period for countries other than Thailand. Thailand's data is based on full 12 month period.

Importation volume data of circular hollow section (CHS) and rectangular or square hollow section (RHS) products from Thailand is further discussed in section 5.6.2 of this report. Section 6.6.2 of this report provides further analysis in respect of Australian market shares for HSS.

4.3.2 Product applications and end uses

ATM claims that locally produced and imported HSS is used in a variety of applications across a range of sectors of the Australian economy including (but not exclusive to):

- automotive;
- engineering construction;
- manufacturing;
- mining, oil and gas;
- residential and non-residential construction;
- temporary fencing;
- transport;

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- furniture and play equipment; and
- rural applications.

ATM claims that end use applications for which HSS may be used include (but not exclusive to):

- scaffolding and fencing (fixed and temporary);
- trailer frames (boat and box);
- mining equipment;
- sign posts;
- playground equipment and shade provision in parks and public spaces;
- architectural finishes in large open span structures (airports and shopping centres, etc.);
- major structural engineering applications;
- gates – domestic, industrial, commercial and rural;
- vehicle chassis (bus and truck etc);
- light manufactured goods;
- gantries that support railway electrification cables;
- domestic, rural, commercial and industrial structures;
- sporting stadiums;
- light fabrication and maintenance work;
- truss systems for roofing within variable structure types; and
- agricultural equipment such as spray systems, hay feeders, cattle crushers, cattle yards.

4.3.3 Marketing and distribution

ATM submits that the Australian HSS market comprises local manufacturers, overseas suppliers, importers, wholesalers, distributors, resellers and end users.

Figure 2 below, provided in the application, depicts the supply arrangements on the Australian HSS market.

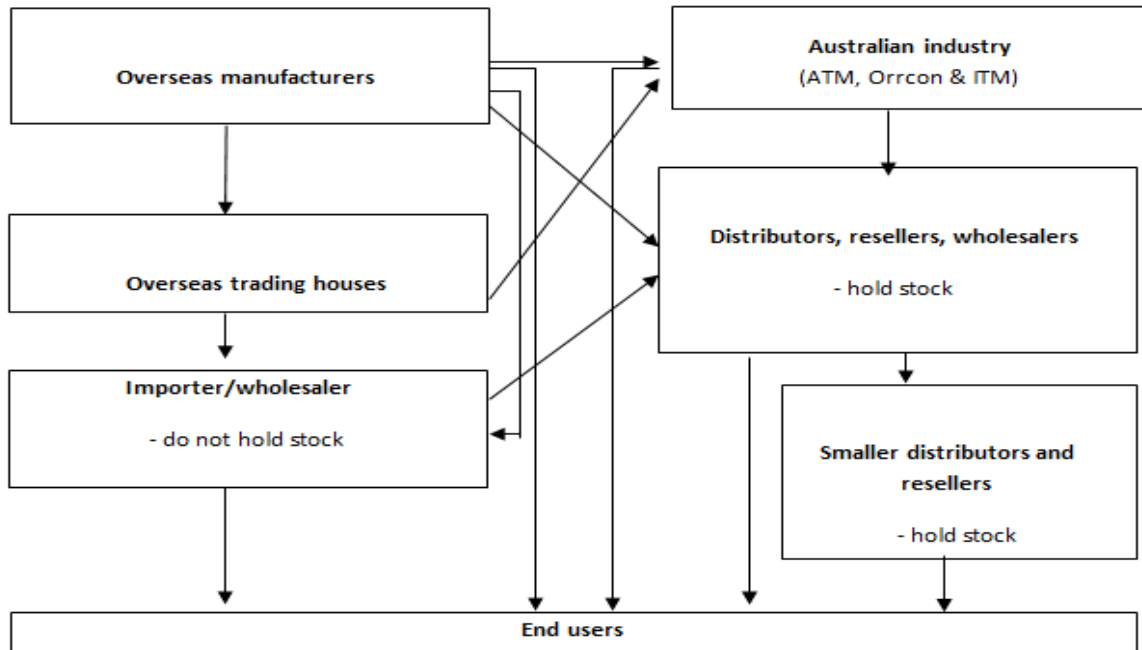


Figure 2: Australian market HSS distribution and supply channels.

4.3.4 Market segmentation

The applicant stated that HSS is supplied to a diverse range of market sectors as explained in section 4.3.2.

The application states that, in terms of geographic segmentation, ATM sells and distributes across Australia and that similarly, imported HSS is sold and distributed across Australia.

The applicant further claims that the expansion of the total HSS market over recent years, along with an increase in the number of market participants indicates that product availability and pricing in the HSS market is generally transparent, irrespective of market segment.

4.3.5 Demand variability in the HSS market

ATM claims that recent growth in the mining industry has been a catalyst for increased demand of HSS in Australia. Similarly, the applicant claims that growth in the pool and temporary fencing market are also reasons for an increase in the overall size of the Australian market. The Commission notes that this claim is inconsistent with data provided indicating a contracting Australian market.

ATM also claims that there are factors, which may be regarded as seasonal, that affect the Australian HSS market, including:

- the construction cycle – the months of December and January each year effectively aggregate to one normal month of sales given that the traditional construction industry holiday period falls at this time; and

- a take up of sales to the rural sector in May and June each year – driven by the desire of the farming community to resolve any outstanding repairs and maintenance issues prior to the end of the financial year.

4.4 Australian industry information

4.4.1 Australian industry's sales

The application includes a summary of domestic and export sales volumes, revenue, discounts and rebates as required in Appendices A2, A3, A5 and A6. The Commission examined the detail in, and link between, these appendices, and considers them reliable for the purposes of assessing the economic condition of the industry.

The application also includes detailed domestic sales of HSS for 2013/14.

4.4.2 General accounting and administration information

ATM advised that its financial year is 1 July to 30 June and also provided details of general accounting and administration information in its application. The Commission notes however that data provided by the applicant is primarily for the annual period April to March.

The applicant provided the audited annual report for financial year 2012/13 for its parent company, Arrium Limited.

4.4.3 Cost to make and sell information

The applicant completed Appendix A6 of the application for domestic and export sales of its own production by quarter. The information provided included production volumes, manufacturing costs, selling, distribution and administrative expenses and sales volumes from 2010/11 to 2013/14.⁹ The information was also provided for each HSS product (by finish) manufactured by ATM.

The Commission examined the information provided in Appendix A6 and the link between other appendices and considers the information reliable for the purposes of assessing the economic condition of the industry.

4.4.4 Other economic factors

The applicant completed Appendix A7 to the application identifying assets, capital expenditure, research and development expenses, return on investment, capacity, capacity utilisation, productivity, cash flow measures and wages during July 2009 to March 2013 period.

The application included indices of revenue variations and employment numbers.

⁹ April to end of March annual periods.

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The Commission noted that the figures the applicant submitted in Appendix 7 of its application is consistent with the data provided in other Appendices of the application and supported the claims with respect to other economic factors.

4.4.5 Conclusion – Australian industry

Based on the information in the application, the Commission considers that there is an Australian industry producing like goods to the goods the subject of the application and that the data contained in the application is sufficient for the purpose of analysing the economic condition of the industry from 1 April 2010 to 31 March 2014.

5 REASONABLE GROUNDS – DUMPING

5.1 Findings

Having regard to the matters contained in the application and to other information considered relevant, the Commission considers that there appear to be reasonable grounds to support ATM's claim that HSS has been exported to Australia from Thailand at dumped prices.

5.2 Legislative framework

Article 5.2 of the World Trade Organization Anti-Dumping Agreement states that an application shall include evidence of dumping. It also states that simple assertion, unsubstantiated by relevant evidence, cannot be considered sufficient to meet this requirement, but such information must be reasonably available to the applicant.

Subsection 269TC(1) of the Act requires that the Commissioner must reject an application for a dumping duty notice if, inter alia, he is not satisfied that there appear to be reasonable grounds for the publication of a dumping duty notice.

Under section 269TG of the Act, one of the matters that the Parliamentary Secretary to the Minister for Industry (Parliamentary Secretary) must be satisfied of to publish a dumping duty notice is that the export price of goods that have been exported to Australia is less than the normal value of those goods. This issue is considered in the following sections.

5.3 Assessment of Dumping Claims

To support its application, ATM commissioned [REDACTED] [a business consulting firm] to conduct a market survey of HSS prices in Thailand during 2012 and 2013. The report, entitled '*Market Study – HRC & HSS in Thailand*' ([REDACTED] Report) [consulting firm's report] is attached at **Confidential Attachment 4**.¹⁰

5.3.1 HSS products for assessing dumping margins

The goods the subject of ATM's application include HSS with black, painted and galvanised or non-galvanised finishes and whether or not including alloys (with specific dimensions, Section 2.2.1 refers).

For the purpose of calculating dumping margins, ATM has identified two pipe sizes that it claims are representative of a significant volume of the Thai domestic market.

¹⁰ The Commission understands that the conclusions reached in the [REDACTED] Report [consulting firm's report] are based on interviews with key players, distributors and market participants; reviews of other source documents and information including: *Iron and Steel Institute of Thailand, 2012 Annual reports of Pacific Pipe and Sam Chai Steel Industries, American Society for Testing and Materials, Australian Steel Institute, Thai Industrial Standards Institute, Japanese Standard Association, the Customs Department of Thailand, and Customs Facilitation of Thailand.*

Table 1 provides the two particular CHS and RHS HSS products in the [REDACTED] Report, with black finishes (not painted or galvanised) with specific dimensions and wall thicknesses:

HSS Profile	Dimensions	Wall thickness (mm)
CHS	1 ½ inch outside diameter	2.0
RHS	2 inch x 2 inch	2.0

Table 1: HSS profiles used to derive the applicant’s estimated dumping margins.

ATM further claims in its application that HSS with a black finish represents approximately 70 per cent of Thailand’s domestic market with galvanised and painted representing 23 per cent and 7 per cent of the market respectively.¹¹

5.3.1.1 The Commission’s assessment

The Commission considers that the particular HSS profiles selected by ATM to estimate dumping margins appear not to be representative of the predominant models exported to Australia. A review of the data of one major Thai HSS manufacturer verified during the previous HSS investigation (Termination Report 177 (TER177) refers) shows that the selected HSS products supplied by this exporter represented a very small proportion of total HSS products sold to Australia during the relevant investigation period.

In addition, the two selected HSS profiles by ATM do not appear to conform to the predominant HSS standards. Both the Australian HSS standard (AS/NZ 1163:2009) and the Thai HSS standard (TIS107) appear to indicate that the selected HSS products would not satisfy either standard due to the thin wall thickness of the products.

However, notwithstanding the issues identified above, the Commission notes that an applicant can only provide information in its application that is “reasonably” available to it. The Commission has also identified that black pipe is the base product for HSS with any finish and its production cost represents a large proportion of the production cost of HSS with other finishes.

The Commission therefore considers that using HSS with a black finish to estimate dumping margins for a range of HSS exports is reasonable.

5.3.2 Most recent investigation for HSS exported from Thailand – dumping findings

During investigation 177, HSS exports to Australia from Thailand during the period 1 July 2010 to 30 June 2011 were investigated to determine whether dumping had occurred. The ACBPS’ final results of the investigation (contained in TER177) for Thailand’s co-operating HSS manufacturers are at Table 2:

¹¹ ATM’s Application page 32 refers.

Exporter	Dumping margin
Pacific Pipe Public Co. Ltd. (Pacific Pipe)	Negative 6.1%
Saha Thai Steel Pipe Public Co. Ltd. (Saha Thai)	Negative 3.5%
Samchai Steel Industries Public Company Limited (Samchai)	Positive 13.1%

Table 2: Dumping margins determined for exporters of Thailand for most recent HSS investigation

In TER 177, ACBPS found that HSS exported to Australia by Pacific Pipe and Saha was not dumped and that, although Samchai exported HSS to Australia at dumped prices in the investigation period, the total volume of HSS exported to Australia by that exporter, when added to the volume of all other Thai exporters except Pacific and Saha was less than 3% of the total Australian import volume of all HSS during the investigation period.

Accordingly, the CEO of ACBPS terminated investigation 177 in so far as it related to Thailand.

5.4 Export prices

5.4.1 ATM's claims

In its application, ATM sourced data regarding export prices and volumes from [REDACTED] data and [REDACTED]'s export statistics. With respect to each of the sources of data, ATM claims:

- Australian Bureau of Statistics (ABS) data is subject to confidentiality restrictions and accordingly information pertaining to source country, volumes, values, and state of importation is not available.
- [REDACTED]¹² [source of HSS market data] provided export data in relation to monthly volumes and free-on-board (FOB) export price values for all profiles of HSS (including all finishes and sizes) exported to Australia for the relevant tariff classifications. [REDACTED] data differs from published ABS data as it reflects exports from Thailand rather than imports to Australia. It was assumed by ATM that an export in a particular month would arrive Australia the following month.
- [REDACTED]'s [source of HSS data] website identifies monthly volumes and monthly export prices for both CHS and RHS products exported to Australia.

ATM states that [REDACTED] [REDACTED] data and [REDACTED]'s data match each other. ATM has relied upon export prices for CHS and RHS pipe from the [REDACTED] website for the purposes of identifying export prices to Australia for Thai HSS.

¹² [REDACTED] is a recognised, independent supplier of information related to the worldwide steel manufacturing industry

5.4.2 The Commission’s assessment

The Commission verified the reliability of export volumes from Thailand in ATM’s application to ACBPS’ database for calendar year 2013 with the resulting differences in volumes at Table 3. The Commission notes that the variance between [REDACTED]’s data and ACBPS data is insignificantly small.

Import Volume of HSS from Thailand from ACBPS Database (MT)	Thailand’s HSS exports to Australia. [REDACTED] Data in ATM’s Application (MT)
[REDACTED]	[REDACTED]

Table 3: Comparison of Thailand’s volume of HSS exports to Australia data sourced from ACBPS and [REDACTED]

The Commission compared monthly FOB export prices in ATM’s application for the calendar year 2013 with weighted average monthly FOB export prices of CHS and RHS for 2013 extracted from ACBPS’ import database.

The Commission calculated that the ACBPS’ FOB import prices for CHS were slightly higher than [REDACTED]’s FOB export prices submitted and used for estimating dumping margins by ATM in its application.

The Commission then calculated weighted average monthly FOB export prices of RHS from ACBPS’ database and compared with the FOB export prices submitted in ATM’s application in the same manner. The comparison showed that the ACBPS’ monthly FOB export price data for RHS are on average marginally lower than Thailand’s FOB export prices for RHS submitted in ATM’s application for calendar year 2013.

The Commission calculated that the overall weighted average of variance in HSS export prices from Thailand for 2013 calendar year was small enough to be considered insignificant.

The Commission notes that a certain amount of these variances will result from timing differences in terms of inputting or collecting relevant data. Additionally, the Commission is of the view that some variance should normally be expected due to the fact that, while the Commission filtered ACBPS’ data according to statistical codes in the application, the data from [REDACTED] and [REDACTED] [sources of HSS data] appear to include all statistical codes within the tariff classification.

The Commission’s comparison of monthly FOB export prices in ATM’s application with weighted average monthly FOB export prices of CHS and RHS for calendar year 2013 from ACBPS’s import database is at **Confidential Appendix 1**.

5.4.3 Conclusion: export prices

After comparing the prices contained in the application with ACBPS’ database and then calculating the weighted average variances for CHS and RHS prices, the Commission is satisfied that the export prices of HSS from Thailand submitted by ATM are reasonable estimates for the purpose of this application. The Commission is satisfied that:

- ATM sourced these prices and volumes from a reputable market intelligence company, [REDACTED] specialising in steel trade data; and
- this data is further validated using [REDACTED]'s database and segregated to CHS and RHS types for comparison.

5.5 Normal values

5.5.1 Domestic prices in Thailand

In order to estimate normal values based on domestic prices of HSS supplied in Thailand, ATM relied on the conclusions contained in the [REDACTED] Report and the average domestic prices obtained from a quotation of [REDACTED] [a major manufacturer of HSS in Thailand] to a distributor in Thailand.

The report includes an overview of Thailand's domestic market for HSS products, an explanation of the supply and demand structure, details regarding competition between suppliers, customer segments and the difference in grades of products sold domestically. The report also provides information on the major manufacturers of HSS products explaining their production capabilities and target markets.

The [REDACTED] Report includes domestic prices in Thailand (per 6 metre pipe length) for the selected HSS products.¹³ The report also states that the selected products are compatible with TIS 107 Thai standards and conform to ASME/ANSI B36.10¹⁴ with respect to standard dimensions for production.

[REDACTED] [consulting firm that wrote the HSS market report] states that it conducted market interviews with distributors who purchase products directly from manufacturers. [REDACTED] lists purchase prices of two of these distributors (being [REDACTED] and [REDACTED] [HSS distributors]) from manufacturers and their selling prices to end users for the selected products. The market data was collected for the following months:

- October 2012;
- January 2013;
- May 2013;
- July 2013; and
- September 2013.

ATM uses a simple average of these two distributor's monthly purchase prices of CHS and RHS products to estimate distributor level domestic prices for the selected products in Thailand. These prices are listed in Table 4 below. The [REDACTED] Report pages 20 and 35 suggest that free delivery is a standard promotion offered by almost every producer and additional domestic freight may be payable depending on volumes and location.

¹³ CHS (black finish) – ½ inch x 2mm and RHS (black finish) – 2 inch x 2 inch x 2mm

¹⁴ Covers the standardization of dimensions of welded and seamless wrought stainless steel pipe.

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Period	CHS 1 ½ inch by 2mm (THB per 6 metre length)	RHS 2 inch x 2 inch by 2mm (THB per 6 metre length)
October 2012		
January 2013		
May 2013		
July 2013		
September 2013		

Table 4 – Domestic prices of selected products in Thailand in ATM’s application

For Thailand domestic market HSS prices in the first quarter of 2014, ATM relies on a quotation from [redacted] [a major manufacturer of HSS in Thailand] dated May 2014. ATM calculates the simple average of prices quoted to a distributor in Thailand for various sizes on CHS and RHS products manufactured according to TIS 107 standard. The average of [redacted] [company] ex-factory CHS quoted price is [redacted] Baht/tonne and the average quoted ex-factory RHS price is [redacted] Baht/tonne in ATM’s normal value calculations. [redacted] [company] quotation dated May 2014 is at **Confidential Attachment 6**.

5.5.2 Adjustments claimed by ATM for fair comparison

In its application, ATM claims the following adjustments should be made to domestic HSS selling prices to ensure fair comparison with export prices:

- port loading costs;
- containerisation costs;
- painting costs that are not included in quotes for domestic prices of black HSS pipes;
- grade differences in hot rolled coil grade differential for quoted pipe sizes; and
- differences in permissible weight tolerances between products manufactured according to TIS 107 and AS/NZS 1163 and AS 1074 products.

ATM claims that the inland freight expenses included in the domestic selling prices (at delivered terms) are expected to be similar to export inland transport expenses and therefore has made no claim for adjustment of these factors.

5.5.3 The Commission’s assessment

5.5.3.1 Domestic Prices in Thailand

In its application, ATM converted the domestic selling prices included in the [redacted] report for HSS, expressed as prices per six metre length into prices per metric tonne. It appears, based on information provided in the application, that ATM has based this conversion on theoretical weights rather than actual weight.

For the domestic prices during the first quarter of 2014, ATM calculated average prices of CHS and RHS from a quotation taken from [redacted] [a major HSS producer in Thailand] by a domestic distributor in Thailand. The Commission compared the resulting prices with the pricing information of black CHS and RHS available to the Commission from the previous HSS investigation (177). The

Commission observed that the Thai domestic prices in ATM's application show a correlation to HRC¹⁵ East Asia import price movements during the comparison period. The Commission noted during its previous investigations that RHS is usually slightly more expensive than CHS; this price difference continues to be observed in the data provided in this application.

As explained in section 5.3.1.1 above, the Commission does consider that the particular HSS products selected in [REDACTED] Report are representative of the predominant models exported to Australia. To ensure that the products with seemingly thin wall thicknesses do not attract a price premium in Thai domestic market, the Commission referred to verified data from investigation 177 and queried domestic sales data of major Thai HSS producers for 2mm thick products. The Commission determined that 2mm thick products do not appear to attract a price premium when compared to the weighted average domestic sales prices of all products in the same profile.

The Commission concluded that Thailand's domestic prices for the selected HSS products in ATM's application are acceptable based on the data that is reasonably available to it. The comparison of verified domestic HSS prices in Thailand and the prices in ATM's application is in **Confidential Appendix 2**

5.5.3.2 Adjustments

In relation to the claims for adjustments in the application, the Commission has formed the preliminary views discussed below.

a) Port Loading

In its dumping margin calculations, ATM claims an upward adjustment of AUD\$ [REDACTED] per tonne for port loading costs of exported HSS products. ATM has estimated the port loading costs based on costs it incurs for unloading vessels in Australian ports. ATM has provided an invoice as evidence of unloading costs per tonne. The Commission compared this cost with the verified export handling costs of major HSS exporters in Thailand as detailed in REP177 and is not satisfied with ATM's claim of \$ [REDACTED]/tonne adjustment.

The Commission considers that the total average handling costs of exporters from Thailand should be estimated as [REDACTED] THB/tonne (approximately A\$ [REDACTED]/tonne).

b) Containerisation

In its application, ATM claims an upward adjustment for containerisation costs of exports incurred by exporters from Thailand in the normal value calculations. ATM argues that it is common that the majority of galvanised products are loaded into containers prior to shipping to prevent moisture damage to the galvanised coating known as "white rust".

ATM estimates the Australian galvanised HSS market to be [REDACTED]% of the total HSS market. Based on this, ATM contends that it is reasonable to expect that [REDACTED]% of

¹⁵ Main input material for production of HSS.

HSS imports from Thailand are shipped in containers. In addition to that, ATM also asserts that shipments to smaller volume states such as Western Australia, South Australia, Northern Territory and Far North Queensland ports are frequently sent via containers due to the shipment volumes being below what is required to be sent via break bulk.

To substantiate its containerisation adjustment claim, ATM provided the Commission with a price offer from a Thai manufacturer. The Commission noted that the offer included a \$[REDACTED] per metric tonne surcharge for container shipments.

ATM states that such a containerisation cost is not included in the Thai domestic prices. For the purposes of calculating a containerisation adjustment, ATM claims that [REDACTED]% of the published \$[REDACTED] surcharge for containerised shipping which is [REDACTED] THB per tonne or \$[REDACTED] per tonne should be factored in to the normal value calculations.

To assess ATM's estimate about the percentage of containerised shipments of HSS from Thailand, the Commission referred to ACBPS' database and queried for all HSS that fall within the goods description that arrived Australia in containers between 2010 and 2014. The data from ACBPS' database showed that ATM's estimation for the percentage of containerised HSS shipments from Thailand is reasonable. The analysis of containerised HSS shipments is in **confidential appendix 3**.

To verify the extra cost of container shipments, the Commission referred to other price offers from Thai HSS manufacturers that ATM provided in its application to support its price undercutting claims. The Commission noted that the other offers from a particular HSS manufacturer from Thailand also included \$40 to \$70 extra containerisation surcharge per metric tonne.

As a result, the Commission considers a \$[REDACTED] or [REDACTED] THB per tonne containerisation adjustment to domestic prices reasonable to calculate a normal value for the purposes of this application.

c) Painting

ATM claims a [REDACTED] THB/tonne upward adjustment for painting. ATM explains in its application that it estimated a \$[REDACTED]/tonne adjustment for painting based on the \$[REDACTED]/tonne discount for lightly oiled products in the price offer from a Thai manufacturer explained under section 5.5.3.2(b). The Commission notes that the domestic prices in Thailand are quoted for black (unpainted) HSS. Using the previous investigation's (REP177) verified export data, the Commission calculated that the majority of Australian imports from Thailand are painted HSS products as **confidential appendix 4** refers. The Commission considers at this stage, that a painting adjustment is appropriate.

To evaluate the reasonableness of the value of the painting adjustment, the Commission compared the painting adjustment claimed by ATM with its verified costs of painting HSS products per tonne from the previous investigation (REP177). The Commission considers that the adjustment amount of [REDACTED] THB (approximately \$[REDACTED]) per metric tonne claimed by ATM is reasonable.

d) Grade Differences

ATM claims that an upward adjustment is required to domestic prices in Thailand to remedy the difference in grades between domestically sold HSS products and Australian exports conforming to AS/NZ 1163 standards.

ATM claims that:

The market research report shows that domestically produced pipe and tube is sold into the Thai market as either a 'Commercial' or 'Standard' grade. Commercial grades which comprise approximately 63% of the market are essentially 'house' brands with quality specifications such as grade and mass tolerances determined by each manufacturer...

'Standard' grades comprise only [REDACTED]% of the market and are predominately manufactured to either the Thai International Standard ('TIS') or the Japanese International Standard ('JIS')...

To substantiate its claim, ATM relies on

- the price difference between a 'commercial' product and a 'standard' product demonstrated on Page 25 of the [REDACTED] Report; and
- the export price offer from a Thai HSS manufacturer.

ATM contends that the comparison of sales price to a 1st wholesaler¹⁶ for 2.0mm CHS and RHS, (a commercial grade¹⁷ size), versus a project sales¹⁸ price for 2.3mm CHS and RHS (a TIS 107 size) in [REDACTED] Report page 25, shows a price difference of 12 to 15 per cent per tonne. ATM alleges that the observed price difference was solely due to the difference of grades between two HSS products but did not provide further evidence of its claims. The Commission notes that ATM's dumping margin calculations allow for a grade difference adjustment of [REDACTED] THB per tonne (approximately \$[REDACTED]).

ATM argues that, the normal values should account for the fact that commercial grades that are sold in Thailand's domestic market are of lower quality than HSS that are exported to Australia. To quantify the level of adjustment required, ATM relies on the price offer from a HSS manufacturer in Thailand. ATM states that, as the price offer includes a surcharge of \$[REDACTED] per metric tonne for AS/NZ 1163:2009 C350 grade and \$[REDACTED] per metric tonne for [REDACTED] grade material, an uplift of [REDACTED] THB/tonne or \$[REDACTED] per tonne should be factored in to the normal value. The Commission notes however

¹⁶ A first wholesaler, as referred in [REDACTED] Report is a distributor that purchase direct from factory in bulk quantities.

¹⁷ Commercial grades are explained as grades of HSS products that are manufactured to serve the demand of pipes that do not need to comply with TIS, AS/NZ or JIS standards at page 30 of [REDACTED] HSS market study.

¹⁸ Project sales are to a 'contractor' in contrast to sales made to a distributor or 1st wholesaler

that, in its normal value calculations, ATM used a [REDACTED] THB (approximately \$[REDACTED]) per tonne uplift to Thai domestic prices.

The Commission considers that, in order to allow for a grade adjustment in the normal value calculations, the grades of HSS sold in Thai domestic market needed to be known with certainty. The Commission maintains that the differences in prices of project sales and sales to first wholesalers as referred to in the [REDACTED] Report could be due to a number of reasons such as different levels of trade, different sales volumes and credit terms.

To evaluate the basis of ATM's grade adjustment claim, the Commission reviewed verified domestic sales data available from investigation 177 and did not find evidence supporting ATM's claims. Therefore, the Commission considers a grade adjustment is not warranted for the purposes of considering this application.

e) Weight Tolerance Adjustment

ATM claims that a weight tolerance adjustment is required in relation to the difference in tolerances between domestically sold product¹⁹ and the exported goods.²⁰

ATM explains in its application that for domestically sold HSS, manufactured in accordance with the Thai standard TIS107, a weight tolerance of +/- 10 per cent is permitted, whereas for exports to Australia, in accordance with AS/NZ 1163 and AS 1074, a weight tolerance of only +/- 4 per cent is permitted. ATM claims that a difference in weight of 6 per cent is evident, thereby requiring an upward adjustment of 6.6 per cent to the domestic prices in Thailand to account for domestic pipe that is 'rolled light' when compared with the goods exported to Australia.

ATM also alleges that the difference in tolerances between Thailand's 'commercial grades' and Australian standard products are expected to be greater depending on the mill supplying the goods. ATM states in its application that the normal values calculated according to theoretical weights will have notionally lower price per tonnes than normal values calculated according to actual weights. ATM claims that using theoretical weights in normal value calculations incorrectly lowers the potential dumping margin.

To support its claim, ATM relied on information collected by [REDACTED] during market research, specifically the following quote from a pipe manufacturer:

"we aim to maintain no lower than -8 per cent tolerance so we mainly purchase coil to produce at the thickness of -5 per cent to -8 per cent tolerance"

The [REDACTED] report also includes the following information with respect to each of the major manufacturers of HSS in Thailand:

Pacific Pipe:

¹⁹ Thai Standard: TIS107

²⁰ Australian Standard: AS/NZ 1163 and AS 1074

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- produced approximately [REDACTED] per cent of HSS manufactured in Thailand in 2012 (the largest Thai manufacturer);
- [REDACTED]% of total pipes are sold domestically;
- the Tamose brand (TMS) is a 'commercial' grade product and accounts for approximately [REDACTED] per cent of total sales volumes in 2012;
- the TMS brand has a weight tolerance of +/- [REDACTED] per cent; Pacific Pipes other standard offering, 'PCP' is certified against international standards and appears to have a tolerance of +/- [REDACTED] per cent.

Saha Thai:

- produced approximately [REDACTED] per cent of the total production volume by Thai manufacturers in 2012;
- of its production [REDACTED] per cent is consumed domestically;
- page 14 of the [REDACTED] Report states that 'the data of tolerance standard by Saha Thai is not available'; page 30 of the report provides that Saha Thai's commercial standard has a weight tolerance of between +/- [REDACTED] per cent to [REDACTED] per cent for different sized products.

Sam Chai:

- produced approximately [REDACTED] per cent of the total production volume by Thai manufacturers in 2012;
- of its production, approximately [REDACTED] per cent is sold domestically;
- commercial standard products account for approximately [REDACTED] per cent of total sales;
- page 30 of the [REDACTED] report states that a weight tolerance for Sam Chai's commercial grade product is 'N/A'.

The Commission notes that the information included in the [REDACTED] report with respect to the proportion of Pacific Pipe and Saha Thai product sold domestically correlates with verified data obtained during the previous investigation.

During the consideration of its application, ATM lodged a submission to substantiate its weight tolerance adjustment claim. ATM's submission included eight attachments to support its view that 'rolling light' is a common industry practice and prove that weight tolerance adjustments had been taken into account by different anti-dumping authorities.

In the confidential attachments 1A and 1B of its submission, ATM provided the Commission with a table of actual test results of previously owned samples of various imported HSS products. ATM claim that the results in part belong to a prominent Thai HSS manufacturer's product and showed that the wall thickness was measured to be thinner than the nominal thickness but within the allowable limits of AS/NZ 1163

standard. The Commission then calculated that the actual weight of the sample piece was approximately 4.05% lighter than the nominal weight. ATM's test results and actual weight calculations are at **confidential appendix 5**.

In its attachment 2 of the submission, ATM provided the Commission the US Department of Commerce's memorandum dated 9 October 2011 in respect of an Administrative Review of Certain Welded Carbon Steel Pipes and Tubes from Thailand²¹. The Commission understands that US authorities had taken a theoretical to actual weight conversion factor into account while calculating certain labour and overhead costs that are allocated with respect to the total weight of products manufactured.

Attachment 3 of ATM's submission is US Department of Commerce's memorandum dated 3 October 2012 in respect of an Administrative Review of Circular welded Pipes and Tubes from Thailand²². One of the discussion points in this memorandum is actual-to-theoretical conversion factor for Saha Thai's cost of production. The Commission noted that Saha Thai made the comment below in the context of the relationship between the standards' allowable weight tolerances and its cost of control numbers (CONNUMS):

'American Society for Testing and Materials (ASTM) products have a tolerance range that allows producers to manufacture to as low as 90 per cent of the total theoretical weight. As such, the conversion ratio should thus be relatively close to the 90 per cent range for matching comparison market CONNUMs. There is a zero tolerance range for the wall thickness of the made-to-order non-matching comparison market CONNUMs and, as a result, the made-to-order CONNUMs have a conversion factor of 100 per cent, or close to 100 per cent.'

ATM argues in its submission that the US Department of Commerce's determinations concerning adjustments for actual to theoretical weight difference reinforce its claims that HSS manufacturers from Thailand produce and sell to the domestic market according to domestic standards (i.e. TIS 107 or manufacturers' own declared standards), and produce and sell to export markets at a different standard (i.e. AS/NZ 1163 or AS1074 in case of exports to Australia).

Attachment 4 of ATM's submission is the Council of the European Union's Regulation No 1697/2002 dated 23 September 2002 imposing definitive anti-dumping duties on imports of certain welded pipe and tubes of iron or non-alloy steel originating in the Czech Republic, Poland, Thailand, Turkey and the Ukraine. The Commission notes that the European Commission decided to make an adjustment for "differences in physical characteristics". ATM claims, without providing further evidence, that the differences in physical characteristics include the varying tolerances applicable between the goods sold in Thailand's domestic market and goods exported to European Union countries.

²¹ Case A-549-502

²² Case A-549-502

Attachment 5 of ATM's submission includes a graphic depicting the distribution of actual masses around nominal weight in ATM's own HSS production between 11 January 2012 and 2 June 2014. The Commission notes that median of the graph peaks at [REDACTED]. ATM explains its target tolerance rates in its submission as:

'ATM aims to manufacture to a minus [REDACTED] per cent tolerance for goods produced to AS/NZ 1163 and/or AS1074 which allow a minimum tolerance of minus 4 per cent.'

Attachment 6 of ATM's submission is a paper titled "Effect of material properties on hollow section performance"²³. The Commission notes that the authors of this paper are of the view that, as ASTM International (2010) standards allow for a -10 per cent wall thickness and do not impose any restriction on weight tolerances for electric-resistance-welded HSS, these products are being routinely produced undersize. The authors argue that:

'The American Institute of Steel Construction Specification (AISC, 2010) accounts for this practice by designating a 'design wall thickness' of 0.93 times the nominal wall thickness for structural design in the USA, whereas the Canadian Institute of Steel Construction (CISC, 2010) stipulates a 'design wall thickness' of 0.90 times the nominal wall thickness for structural design in Canada. All section properties for each country are then calculated based on the respective design thickness. ASTM A500 tubing is also in use in many other countries worldwide without such design guidance, which – considering the much diminished engineering properties relative to the expected values – may result in unsafe design situations.' (page 376)

Attachment 7 of ATM's submission is another published article titled "HSS design for buildings in the United States"²⁴. ATM highlights the following quote from this article in its submission:

'One difficulty with the A500 Specification for structural applications is that it permits an under tolerance on wall thickness of 10%. Since better controlled tolerances are used in the production of steel strip, HSS can be consistently produced to near the minimum wall thickness.' (page 87)

ATM claims that the both of the published articles prove its claims that it is a routine industry practice to manufacture HSS with weights close to the minimum allowable tolerances that the standards allow.

ATM states that, one tonne of HSS produced to TIS 107 standard with a tolerance of minus 10 per cent permitted, only needs to contain 0.90 tonne of steel by weight. In comparison, ATM argues that for one tonne of HSS manufactured to AS/NZ 1163

²³ Effect of material properties on hollow section performance, J.A. Packer, S.P. Chiew, R. Tremblay, G. Martinez-Saucedo, Proceedings of the Institution of Civil Engineers, Structures and Buildings, Vol. 163, Issue SB6, (paper no. 1000002), December 2010.

²⁴ HSS design for buildings in the United States, D.R. Sherman, Tubular Structures IX, Puthli & Herion, 2001

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standard with an allowable tolerance of minus 4 per cent, the minimum allowable weight is 0.96 tonne of steel.

To explain its weight tolerance adjustment claim, ATM states in its application that it was necessary to uplift the domestic prices in Thailand for the 0.90 tonne HSS by 6.6 per cent to align it with the same weight for HSS manufactured to AS/NZ 1163 of 0.96 tonne.

In its application, ATM explains that it is not claiming that all domestic HSS products manufactured according to TIS 107 in Thailand will have an actual weight that is 10 per cent below the theoretical weight. ATM states that it is however reasonable to expect that, if an HSS manufacturer in Thailand purchases a particular thickness of hot rolled coil (HRC) that will yield HSS that is 8 per cent below theoretical weight when the standard has an allowable tolerance of -10 per cent; then, it is reasonable to expect that the same manufacturer would use a particular thickness of HRC that would yield 2 per cent below the theoretical weight when there is an allowable weight tolerance of -4 per cent in the standard. ATM claims that it still maintains a 6 per cent difference in mass and it requires an upward adjustment of 6.6 per cent on the price per weight in the normal value calculation.

In order to assess ATM's claims with respect to the weight tolerance adjustment, the Commission first compared the weight tolerance difference in AS/NZ 1163 and AS 1074 to TIS 107 standard and confirmed that TIS 107 standard allow for a tolerance of +/- 10 per cent. In comparison, AS/NZ 1163 standard requires that the products must not weigh less than 96 per cent of the specified nominal mass and AS 1074 stipulates that quantities over 150m and over of one size shall not deviate from the theoretical mass by more than +/- 4 per cent.

The Commission is aware that all major producers of HSS in Thailand manufacture to a number of different standards including TIS 107 and AS/NZ 1163 and AS 1074. The Commission is also aware that HSS products manufactured to standards other than TIS 107 are being sold in Thailand's domestic market. It is a known fact that each of these international standards contains a number of specifications for different products within a broader category, each of which may have different tolerance levels.

The Commission maintains that, ideally, domestic prices of all HSS products should be calculated with respect to their actual weights rather than the minimum weights allowed by the tolerance of particular standard that the product is manufactured to.

The Commission, however, notes that the domestic CHS and RHS prices in Thailand in ATM's application are of HSS products that are manufactured to or compatible with TIS 107 standard. The data from the previous investigation shows that HSS exported to Australia from Thailand are manufactured predominantly to AS/NZ 1163 and AS 1074 standards. Therefore, the Commission agrees that ATM's claim of an adjustment for allowable mass tolerances between TIS 107 and AS/NZ 1163 and AS 1074 has merit.

The Commission considers that ATM provided enough evidence to support its claim that whenever a standard allows for it, HSS manufacturers produce CHS and HRS products lighter than the theoretical weight that is close to the standards' allowable

limits to benefit from material savings. The Commission understands that ATM calls this practice “rolling light” in its application.

The Commission notes that a test result conducted by ATM on an imported HSS sample of a prominent HSS manufacturer from Thailand shows that the test sample is actually 4.05% lighter than its nominal weight (**confidential appendix 5** refers). Although the Commission does not consider one test result sufficient to conclude on Thailand’s HSS producers’ manufacturing practices, however, when the statement from Saha Thai in US Department of Commerce’s memorandum dated 3 October 2012 for Case A-549-502 and Sam Chai’s submission to SEF 177 dated 13 May 2012²⁵ are taken into account, the Commission considers that the applicant has provided adequate evidence that is reasonably available to it to demonstrate the prevalent practice of rolling light. Therefore, the Commission is satisfied that there are grounds to believe that an adjustment assuming that the HSS products are manufactured to the minimum allowable mass requirement of the standards is reasonable.

Based on the above analysis, the Commission considers a 6.6% adjustment to domestic prices of HSS products is warranted. Hence, the Commission’s normal value calculations include 6.6% uplift to the domestic prices.

5.5.4 Conclusion: normal values

Based on the analysis detailed above, the Commission considers that ATM has provided reasonable evidence to support its estimation of normal values.

To calculate preliminary dumping margins, the Commission has adjusted ATM’s estimates of normal values for the reasons discussed above. The Commission’s estimates of monthly normal values for January, May, July, September 2013 and May 2014 based on the domestic HSS prices in Thailand and the adjustments considered warranted by the Commission are set out in Table 5 below:

	Jan 2013 (THB)	May 2013 (THB)	Jul 2013 (THB)	Sep 2013 (THB)	May 2014 (THB)
Normal Value of RHS	26,675	25,608	28,191	27,282	27,767
Normal Value of CHS	27,843	26,315	28,310	26,141	27,519

Table 5: The Commission’s estimates of normal values for CHS and RHS

The details of the Commission’s estimated normal value calculations are at **Confidential Appendix 6**.

²⁵ In its submission to SEF177, Samchai states that “it [Samchai] failed to recognise the importance of the ratio of actual weight to theoretical weight... The ratios of difference are considerable.”

5.6 Dumping margins

5.6.1 ATM’s claims

Using domestic selling prices of CHS and RHS products from the [REDACTED] Report and [REDACTED]’s [a major manufacturer of HSS in Thailand] quotation and export prices and volumes of HSS exported to Australia from Thailand based on [REDACTED]’s [source of HSS export prices] data, ATM calculated in table 6 monthly dumping margins for CHS and RHS exported from Thailand for the period April 2013 to March 2014.

Month of 2013	CHS - margin	RHS – margin
April	10.76%	8.32%
May	8.87%	2.49%
June	8.85%	6.99%
July	15.69%	8.33%
August	21.37%	13.83%
September	8.87%	13.17%
October	9.72%	15.82%
November	7.99%	16.99%
December	0.38%	N / A
Month of 2014	CHS - margin	RHS – margin
January	7.64%	17.67%
February	2.75%	12.34%
March	2.77%	10.93%

Table 6: ATM’s estimated monthly dumping margins

Using the dumping margin calculations above and taking into account the monthly export volumes from Thailand to Australia derived from [REDACTED]’s [source of HSS export prices] database, ATM calculated weighted average dumping margins for the period February 2013 to January 2014 as seen in table 7.

HSS profiles	Margin
CHS	6.75%
RHS	12.01%
OVERALL HSS	10.26%

Table 7: ATM’s estimated dumping margins for February 2013 to January 2014

5.6.2 The Commission’s assessment

As explained in section 5.5.3 of this report, the Commission considers sufficient evidence has not been provided to substantiate the grade difference adjustment to domestic prices of HSS products claimed by ATM. Section 5.5.4 stated that the Commission has calculated normal values having regard to data available in ATM’s application and other data that is available to the Commission at the time of the application.

The Commission calculated circular and rectangular HSS dumping margins using the following set of parameters:

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- estimates of export prices for CHS and RHS from ATM's application;
- estimates of export volumes for CHS and RHS from ATM's application;²⁶ and
- estimates of normal values using domestic prices in Thailand for distributors from the [REDACTED] Study and [REDACTED]'s [a major manufacturer of HSS in Thailand] HSS quotation and using adjustments that the Commission considers fair as explained in section 5.5.3 of this report.

The Commission weighted unit export prices and normal values using estimates of export volumes as submitted in ATM's application. The Commission's estimates of dumping margins for the period 1 April 2013 to 31 March 2014 are shown in Table 8 below:

HSS profiles	Estimated dumping margin
CHS	3.93%
RHS	9.12%
OVERALL HSS	7.41%

Table 8: The Commission's estimates of dumping margins for HSS from Thailand

The Commission's estimated preliminary dumping margins are lower than the dumping margins that were calculated by ATM (which reflects the revised adjustments and normal values calculated by the Commission). The Commission's dumping margin calculations indicate that HSS exported from Thailand were at dumped prices for the period examined.

The Commission further tested the dumping margins by replacing the monthly import quantities of HSS from Thailand and total monthly import values of HSS by ACBPS' data and calculated that ACBPS' values yield similar dumping margin results for the same period.

The Commission's calculations of dumping margins are at **Confidential Appendix 7**.

5.7 Import volumes

Information available from the ACBPS import database confirms that imports of HSS from Thailand represent more than 3 per cent of the total import volume of HSS during the 12 months between 1 April 2013 and 31 March 2014 and are therefore not in negligible volumes. Analysis of the volume of HSS imports from Thailand is available in **Confidential Appendix 8**.

²⁶ Except the volume of RHS exports in December 2013. This figure is obtained from ACBPS' database

6 ECONOMIC CONDITION OF THE AUSTRALIAN INDUSTRY

6.1 Findings

Having regard to the information contained in the application and to other information considered relevant, the Commission is satisfied that the Australian industry manufacturing HSS appears to have experienced injury in terms of:

- loss of sales volume;
- price depression;
- price suppression;
- reduced profits;
- reduced profitability;
- reduced capital investment;
- reduced return on investment;
- reduced research and development expenditure;
- reduced production and capacity utilisation; and
- reduced employment.

6.2 Legislative framework

Subsection 269TC(1) requires that the Commissioner must reject an application for a dumping duty notice if, *inter alia*, the Commissioner is not satisfied that there appear to be reasonable grounds for the publication of a notice.

Under section 269TG of the Act, one of the matters that the Parliamentary Secretary must be satisfied of in order to publish a dumping duty notice is that, because of the dumping of the goods, material injury has been or is being caused or is threatened to the Australian industry producing like goods.

6.3 Injury claims

ATM claimed that the Australian HSS industry has been injured through:

- loss of sales volume;
- reduced market share;
- price depression;
- price suppression;
- reduced profits;
- reduced profitability;
- reduced capital investment;
- reduced return on investment;

- write-down of goodwill associated with the HSS business;
- reduced research and development expenditure;
- reduced production and capacity utilisation; and
- reduced employment.

6.4 Commencement of injury

ATM claims that HSS exported to Australia from Thailand has caused injury to the Australian industry since June 2012 (after the imposition of measures in respect of certain other countries following REP177).

6.5 Approach to injury analysis

The injury analysis detailed in this section is based on the financial information submitted by ATM and import data from ACBPS' import database.

ATM provided production, cost and sales data for all HSS products. It also provided this data separately for HSS with various finishes (i.e. black, painted and HDG). The data was provided in quarters for the period July 2009 to March 2014.

For the purpose of considering the application, aggregate HSS product data has been used as the primary basis for the purpose of assessing the economic condition of the Australian industry manufacturing HSS. As discussed previously, ATM is one of three Australian manufacturers of HSS. Based on information provided in the application, ATM manufactures approximately [REDACTED] per cent of the total volume of HSS produced by the Australian industry.

The Commission considers that ATM's production and sales of HSS represent a sufficient proportion of the Australian industry that, for the purpose of assessing the application, provides a reliable indication of the performance of the Australian industry as a whole.

6.6 Volume effects

ATM claims that it has suffered material injury in relation to loss of sales volume and market share.

6.6.1 Sales volume

The following graphs show ATM's domestic sales volumes and values for HSS from 2010/11 to 2013/14 years ending March.

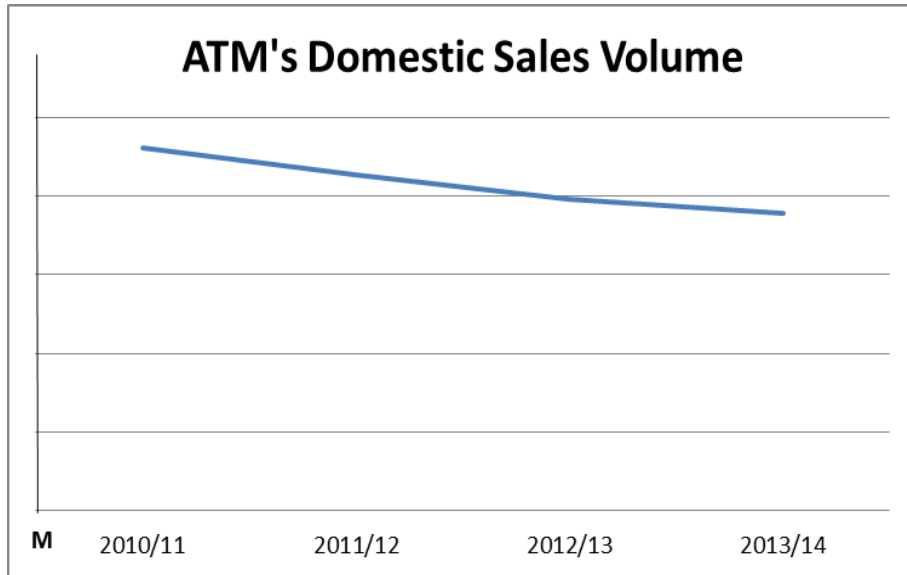


Figure 2: ATM's indexed HSS sales volume in Australia for 2010/11 to 2013/14

Figure 2 above shows that in 2013/14 ATM's domestic sale volume of HSS was more than 18 per cent lower compared to 2010/11.²⁷

6.6.2 Market shares

Figure 3 shows market share movements of the Australian industry, imports from Thailand and imports from other countries in the Australian HSS market for the period 2010/11 to 2013/14 based on the data in ATM's application.

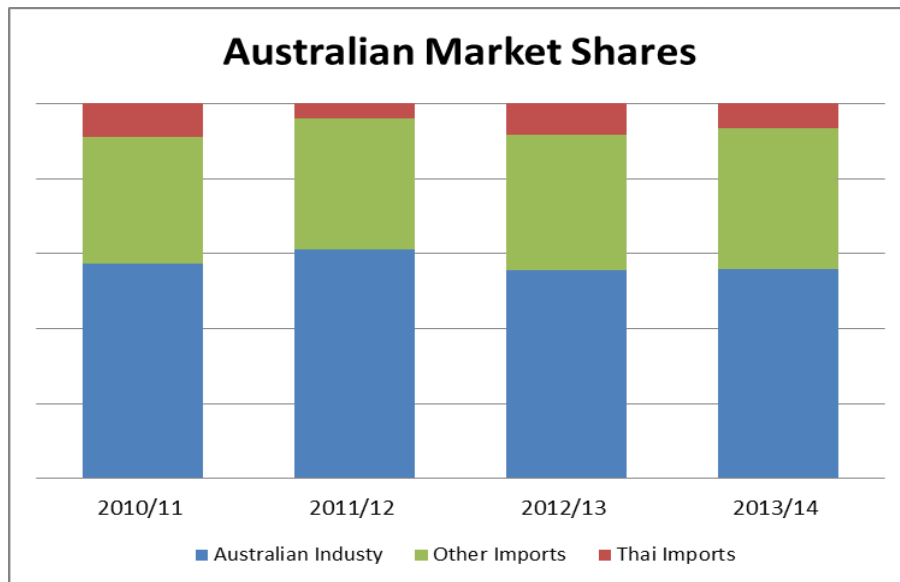


Figure 3: Australian HSS market shares for 2010/11 to 2013/14

²⁷ All years ending March unless specified otherwise in this section of the report.

Figure 3 shows that:

- The Australian industry's share of the Australian HSS market increased by around 4 per cent in 2011/12 before falling in 2012/13 to levels slightly below 2010/11 volumes. The Australian Industry's market share remained constant in 2013/14.
- The market share held by imports from Thailand fell in 2011/12, however increased by over 100 per cent in 2012/13 and fell marginally in 2013/14.

ATM claims that injury to the Australian industry caused by imports from Thailand commenced in June 2012, following the imposition of measures on certain other countries exporting HSS to Australia. The Commission notes that the above figure indicates that the market share held by the Australian industry has remained constant between March 2012 and April 2014, and that the market share of imports from Thailand has dropped marginally for the same period. This is contrary to the claim of lost market share by ATM during the investigation period. However, ATM claims in its application that it was able to hold its market share only by means of reducing its prices below the levels it sold before. The Commission finds ATM's explanation on keeping its market share reasonable.

6.6.3 Conclusion – volume effects

Although the Australian Industry maintained its market share for the past two years, the Commission notes that it could not reach the levels of market share it held before the alleged dumped imports from Thailand are claimed by ATM to have commenced to cause injury. Based on this analysis, there appear to be reasonable grounds to support the claim that the Australian industry has lost sales volume during the period April 2010 to March 2014. ATM's claim with respect to lost market share is not supported by the data provided.

6.7 Price effects

The applicant claims that the Australian industry has suffered material injury in the form of price depression and price suppression.

6.7.1 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 revenues and costs.

In order to conclude whether price suppression and price depression has taken place, the Commission analysed ATM's domestic sales turnover, unit CTMS and unit sales revenues over the 2010/11 to 2013/14 period.

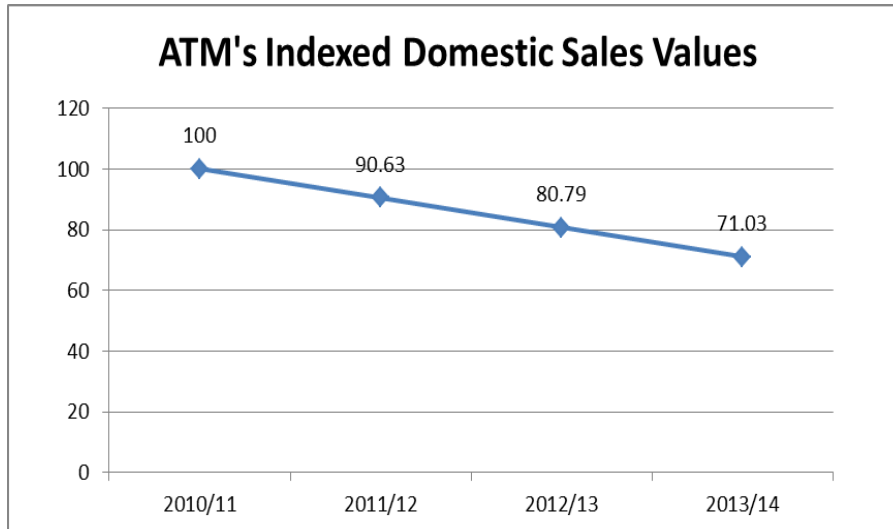


Figure 4: ATM's indexed HSS sales values in Australia for 2010/11 to 2013/14

Figure 4 above shows that ATM's indexed domestic turnover from HSS was more than 30 per cent lower compared to 2010/11.

The following chart show the movements in ATM's unit cost to make and sell (CTMS) and unit selling prices for HSS from 2010/11 to 2013/14.

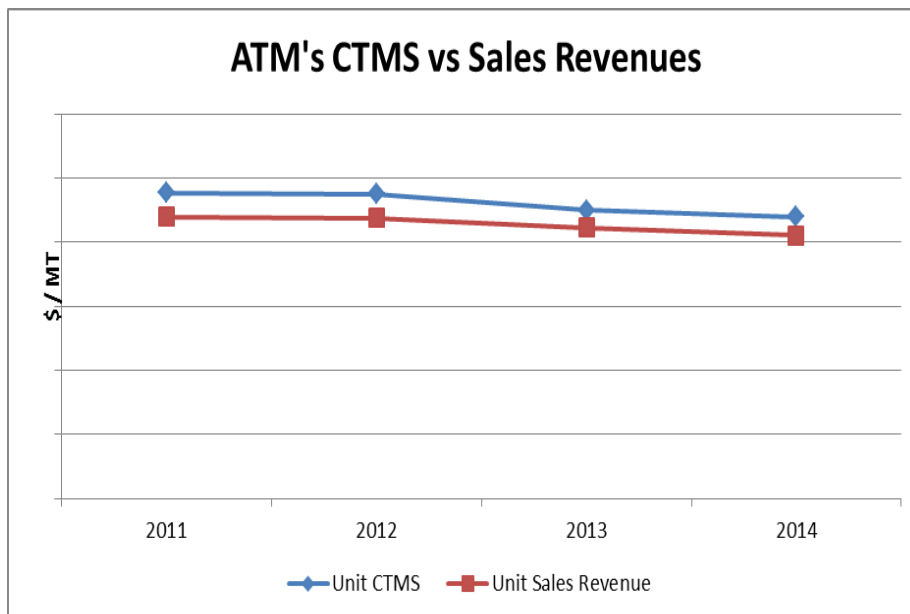


Figure 5: ATM's HSS unit prices and unit CTMS for 2010/11 to 2013/14

Figure 5 above shows that during 2010 to 2014:

- ATM's average unit selling prices for HSS have decreased continually since 2010/11.
- ATM's unit CTMS decreased each year from 2010/11 to 2013/14 but remained consistently higher than the unit price.

ATM explains in its application that the significant reduction in CTMS over 2012/13 and 2013/14 periods are the results of a series of cost cutting exercises carried out

through ATM's plants including the shutdown of certain sections of production and laying off workers.

6.7.2 Conclusion – Price effects

The Commission considers that the above analysis supports ATM's claims and indicates price depression and price suppression effects in Australian market.

The Commission considers that the continuous decrease in domestic prices is indicative of price depression.

Price suppression is indicated by ATM's inability to raise its prices to a level that would enable ATM to make a profit or at least reduce its losses.

6.8 Profit and profitability effects

The following chart shows movements in ATM's profits and profitability (profits measured as a percentage of revenue) for HSS sales in Australia from 2010/2011 to 2013/2014.

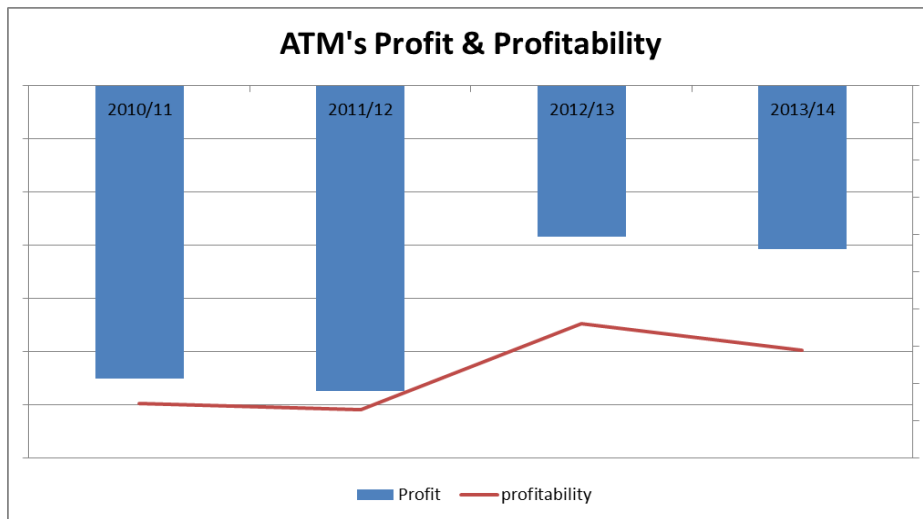


Figure 6: ATM's total profit and profitability for 2010/11 to 2013/14

Figure 6 is ATM's total profit and profitability for HSS sales from 2010/11 to 2013/14, and notes that:

- ATM's profitability deteriorated marginally in 2011/12 before improving in 2012/13 and declining marginally in 2013/14.
- ATM's profits and profitability in respect of domestic HSS sales have been negative since 2010/11.

ATM claims that the improvement in profit and profitability during the period 2012 to 2013 is likely due to a cost cutting exercise by ATM during the corresponding period. The Commission notes that this claim is consistent with the CTMS data provided.

6.9 Conclusion – profit and profitability effects

The data provided in the application supports the claims made by ATM that it has experienced material injury through a loss of profit over the relevant period.

6.10 Summary of major injury indicators

Based on the preliminary analysis detailed above, the Commission considers that during the injury analysis period there appear to be reasonable grounds to support the claim that ATM has experienced injury in respect of HSS sales in the form of:

- loss of sales volumes;
- price depression;
- price suppression;
- reduced profits; and
- reduced profitability.

The Commission's assessment of the economic condition on the Australian HSS industry and the primary injury factors is at **Confidential Appendix 9**.

6.11 Other injury factors

6.11.1 ATM's claims

ATM claims that it has experienced injury in respect of the following other economic / injury factors:

- reduced capital investment;
- reduced return on investment;
- write-down of goodwill associated with the HSS business;
- reduced research and development expenditure;
- reduced production and capacity utilisation; and
- reduced employment.

To support its claims regarding other economic injury factors, ATM completed Confidential Appendix A7 for HSS for the period 2010/11 to 2013/14. The Commission has reviewed the data contained in Confidential Appendix A7 and found that the information submitted appears to support ATM's claims (excluding the write-down of goodwill associated with the HSS business).²⁸

²⁸ Insufficient evidence has been provided to support this claim.

7 CAUSATION FACTORS

7.1 Findings

Having regard to the matters contained in the application and to other information considered relevant, the Commission considers that it appears that HSS exported to Australia from Thailand may have contributed to the material injury experienced by the Australian industry. As concluded in Section 5 of the report, the Commission is satisfied that there appear to be reasonable grounds to demonstrate that these HSS exports are dumped.

7.1.1 The applicant's claims

ATM claims that it expected the imposition of anti-dumping measures on exports of HSS from China, Korea, Malaysia and Taiwan in June 2012 to result in the removal of dumped (and subsidised) prices from the Australian HSS market. ATM further claimed that it expected sales volumes and selling prices of the HSS Australian industry to recover from the suppressed levels identified in REP177.

However, ATM states in its application that, in 2011/12, approximately [REDACTED] tonne of HSS were exported from Thailand to Australia. In 2012/13 (ending March), the volume of HSS exported to Australia from Thailand increased to [REDACTED] tonne which is a 120% increase.

ATM considers that the imposition of anti-dumping measures for HSS exported from China (by certain exporters), Korea, Malaysia and Taiwan provided HSS exporters from Thailand with an opportunity to displace suppliers subject to anti-dumping measures. In addition, ATM claims that HSS exports to Australia from Thailand increased due to the commencement of an anti-dumping investigation into circular welded carbon pipe exports from Thailand by the Canadian Border Service Agency in mid-2012.²⁹

ATM claims that HSS exports from Thailand to Australia in 2013/14 have caused material injury to the Australian industry and contends that the volume of exports from Thailand represents a real and imminent threat of ongoing material injury to the Australian industry producing like goods.

In its application, ATM states that the effect of anti-dumping measures that were applied in June 2012 (by REP177) has diminished as dumped exports from Thailand continue to undercut the Australian industry's selling prices and the Australian industry is still subjected to the injurious effects of the dumping. ATM also states that recent initiatives to reduce its costs will not deliver the intended benefits, as the Australian industry is required to reduce prices in order to remain competitive with dumped imports.

²⁹ This investigation is resulted with the imposition of anti-dumping measures for certain carbon steel welded pipes exported from Thailand to Canada in December 2012. (CBSA File No. 4214-36 Case No. AD1396)

7.1.2 Injury caused by factors other than dumping

In its application, ATM notes that the Australian economy has slowed in 2012/13, which may have impacted on its HSS sales. However, ATM claims that it should also be expected that imports of HSS would similarly be impacted by an economic slowdown. ATM claims that HSS exports from Thailand to Australia, however, have not been impacted by the global economic slowdown and in fact increased by more than 100% in 2012/13 (over 2011/12).

7.2 Price Undercutting

In its application, ATM claims that its sales prices are continuously being undercut by Thai HSS manufacturers. To support its claim, ATM provided a comprehensive summary table of HSS price offers and copies of written price offers from the importers of prominent HSS producers in Thailand. The Commission noted that the prices of HSS products from Thailand are quoted on free-into-store (FIS) basis.

The Commission compared these FIS level base prices from Thailand to ATM's quarterly unit sales prices for the same products during the same quarters. It is observed that the HSS prices from Thailand were continuously lower than ATM's average selling prices for the same periods. The Commission considers that ATM has provided sufficient evidence to support its claim about price undercutting by Thai HSS imports.

7.3 Comparison of export prices and estimated non-injurious prices

As an additional indicator of the causal link between the alleged dumping and injury, the Commission sought to compare export prices from Thailand to an estimate of a non-injurious price (NIP) for the year ending March 2014.

To calculate the estimated NIP for Thailand, the Commission considers it reasonable to estimate the unsuppressed selling price (USP) for HSS products sold by ATM in the year 2013/14 ending March, based on its full weighted average CTMS for that period. At this stage, the Commission has not applied a profit to this CTMS for the purposes of this test.

The Commission then deducted amounts from that USP for importers' selling, general and administration costs and profit, as well as importers' 'into-store' costs, Customs duty and overseas freight.³⁰ These calculations provided a NIP at FOB level, which is suitable for comparison to the export prices as explained in section 5.4.2.

The comparison showed that the weighted average export prices from Thailand in 2013 were below the NIP which supports the Australian Industry's injury claims.

The Commission's estimated USP and NIP calculations and comparisons with FOB export prices are at **Confidential Appendix 10**.

³⁰ The Commission relied on verified data of a major HSS importer from previous investigation (177).

7.3.1 The Commission's assessment

The Commission considers that ATM has provided sufficient information and evidence to substantiate its claims that its selling prices are being undercut by offers of imported HSS products from Thailand. Financial information supplied with ATM's application shows that its selling prices have declined consistently since 2010. Despite ATM's efforts to reduce unit costs significantly since 2012/13, the Commission notes that ATM's profitability does not appear to be improving enough to cover ATM's fully absorbed CTMS.

The Commission considers that the overall contraction in the Australian market for HSS products would have negatively impacted on ATM's operating environment. However, the Commission also considers that ATM's ability to respond to these external environmental circumstances (including declining demand) appears to have been hampered by the competition from imports from Thailand.

While the Commission has estimated dumping margins lower than those estimated by ATM (Section 5.6.2 refers), the estimated dumping margins are not negligible based on the information available to the Commission at the consideration stage. The Commission considers that exports from Thailand are likely to have contributed to intense market competition, with import prices for HSS products that undercut ATM's selling prices.

Based on financial and sales information provided by ATM, the Commission considers that there appear to be reasonable grounds to support the claim that imported HSS products from Thailand have caused material injury to the Australian industry producing like goods.

7.4 Conclusion on material injury caused by dumped imports

The Commission is satisfied that, based on the information submitted in the application, the applicant has demonstrated that:

- it appears to have suffered injury; and
- there appear to be reasonable grounds for concluding that HSS products exported to Australia from Thailand have caused material injury to the Australian industry producing like goods.

8 CONCLUSION

The Commission has examined the application and is satisfied that:

- the application complies with subsection 269TB(4); and
- there is an Australian industry in respect of like goods; and
- there appear to be reasonable grounds for the publication of dumping duty notices in respect of the goods the subject of the application exported Thailand.

For the purposes of the investigation:

- the investigation period to determine whether dumping has occurred will be from **1 July 2013 to 30 June 2014**; and
- The Commission will examine the Australian market and the economic condition of the industry from **1 July 2011** for the purposes of injury analysis.

9 APPENDICES AND ATTACHMENTS

Appendix No.	Title
Confidential Appendix 1	Comparison of Export Prices
Confidential Appendix 2	Comparison of Domestic Prices in Application with Verified Domestic Prices in Thailand
Confidential Appendix 3	Containerised HSS Shipments
Confidential Appendix 4	Percentage of Painted HSS Exports
Confidential Appendix 5	Actual Weight of Sample Thai Product
Confidential Appendix 6	The Commission's Adjusted Normal Values
Confidential Appendix 7	Dumping Margin Calculations
Confidential Appendix 8	Import Volumes of HSS from Thailand
Confidential Appendix 9	Injury Analysis
Confidential Appendix 10	Non Injurious Price
Attachment No	Title
Attachment 1	Commissioner's Instrument
Confidential Attachment 2	Summary of recent investigations into HSS
Confidential Attachment 3	ATM's Production Schema
Confidential Attachment 4	[REDACTED] [REDACTED]: Market Study – HRC & HSS in Thailand
Confidential Attachment 5	Letter to the Applicant
Confidential Attachment 6	[REDACTED] [a major HSS manufacturer in Thailand] Domestic CHS and HRS Quotation dated May 2014