

4.2. Imports to Australia

4.2.1. Description

Fully describe all non-alloy galvanised steel and alloyed galvanised steel you have imported from Korea, Taiwan and China during the inquiry period. **CR980T/700Y MP-LCE HD60G60GU (0.9mm X 1020 wide coil), CR980T/700Y MP-LCE HD60G60GU (0.9mm X 1020 wide coil), CR980T/700Y MP-LCE HD60G60GU (0.9mm X 1020 wide coil), BQXN2014-055-001, ASTM A653-DQ (0.85mm thick X 1090 wide coil), PZT270D-GS (0.7mm thick X 1160 wide coil), EG47G47G-U (PZ270D-GS) 0.7 x 1160mm Coil, GMW2M-ST-S-CR3 EG47G47G-U (PZ270D-GS) 0.7 x 1160mm Coil, GMW CR340LA 60G60 0.6 X 136, GMW3032M-STCR340LA-HD60G60G-U .60x1360mm, GMW14400M-ST-S-HS1300T/950Y-MS-AS60G60G-U (1.0mm thick X 1200C), EN10346,DX54D+ZF90**

Include details of all models of the goods and the circumvention goods imported.

Include specification details, details of alloys and their levels (for alloyed galvanised steel), and include any technical and illustrative material that may be helpful in identifying, or classifying, the imported products.

4.2.2. Exporter identity

For each exporter in Korea, Taiwan and China from whom you imported the non-alloy galvanised steel and alloyed galvanised steel in the inquiry period list: **Refer to spreadsheet provided**

- name; Baoshan Iron & Steel Co.
- address; China
- name; Posco Australia Pty Limited
- address; Australia (Manufactured in Korea)
- name; Nippon Steel (Purchased through Marubeni Itochu Steel Oceania)
- address; Japan

4.3. Importation questions

4.3.1. Import data

Fill in the spreadsheet titled 'Imports' in the attached Excel workbook *Importer Questionnaire – galvanised steel AC* in relation to your imports of non-alloyed galvanised steel and alloyed galvanised steel during the applicable inquiry period of imports from the applicable inquiry countries.

See the cover of this questionnaire for the inquiry period and countries applicable to your imports.

4.3.2. Import documents

From the 'Imports' spreadsheet completed in response to Question 4.3.1, select:

- two shipments of the alloyed galvanised steel; and
- two shipments of non-alloy galvanised steel

in different quarters of the inquiry period.

If your company only imported alloyed galvanised steel during the inquiry period, please select four shipments of those goods.

Provide the following documentation related to those sales:

- any correspondence negotiating terms of the sales, price, products, etc. that you have on record; **None provided**
- purchase order, order confirmation, and contract of sale; **Refer to email attachment in reply to anti circumvention email response**
- commercial invoice; **Refer to email attachment in reply to anti circumvention email response**
- bill of lading, export permit; **Refer to email attachment in reply to anti circumvention email response**
- packing list; and **Refer to email attachment in reply to anti circumvention email response**
- mill test certificate. **Refer to email attachment in reply to anti circumvention email response**

The Commission may select additional shipments for verification or provision of documentation at a later date.

4.3.3. Ordering process

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- a) Fully describe the ordering and purchase process from your overseas suppliers of alloyed galvanised steel from market offer through to invoicing, delivery and payment. **Material specification provided to overseas supplier, quotation is provided to Precision including price, lead time and MOQ, order placed by Precision provided we are happy with commercial terms.**

In your response, indicate the time period for each of the sales process steps. **Time period depends on the company providing the quotation and how diligent they are with their responses.**

- b) Does the process described above differ in any way from the ordering and purchase process of non-alloy galvanised steel? Provide details. **No**
- c) Are the models of alloyed galvanised steel that you imported to Australia during the inquiry period part of your suppliers' standard product offering to Australia, or are they only available under special circumstances (e.g. through special order)? Provide details. **We believe they are standard except for Hot Stamped Boron steels purchased from GNS in Korea. These steels are originally purchased from Nippon in Japan (by GNS and then on sold to Precision) so we would consider them to be irrelevant to this inquiry**
- d) Do you specifically request/order the goods to include alloys that result in it being considered alloyed galvanised steel? Provide details. **Steels are ordered as per the requirements of our end customers (Automotive OEM's)**
- e) What is the minimum order quantity from your supplier of:
- non-alloy galvanised steel;
 - alloyed galvanised steel.

4.3.4. Purchase price

- a) Is there a difference in purchase price from your suppliers between non-alloy galvanised steel and alloyed galvanised steel, assuming all other factors of the sale were the same (e.g. order quantity, product characteristics such as steel grade, coating mass, thickness, credit terms). Provide details. **No**

I.e. are alloyed galvanised steel generally a different purchase price to the goods based solely on the fact that they are an alloyed product? **Pricing determined by supplier. Steel spec determined by Precisions end customer (automotive OEM)**

- b) If the answer to the above is yes, quantify the price difference for each year of the inquiry period. Provide any documents that support this price difference (e.g. price lists, comparable invoices, etc). **Not applicable**

4.3.5. 'Switch' of imports

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If your company 'switched' from importing non-alloy galvanised steel to alloyed galvanised steel during the assessment period, answer the following questions:

No material switch

- a) What was the rationale for this switch in imports?
- b) What was this switch in response to?
- c) What alterations to your ordering processes were needed
- d) When did you first commence importing alloyed galvanised steel to Australia?

4.3.6. Forward orders

Fill in the spreadsheet titled 'Forward orders' in the attached Excel workbook **Importer Questionnaire – galvanised steel AC** in relation to your future imports of non-alloyed galvanised steel and alloyed galvanised steel.

4.4. Australian sales

4.4.1. End use

- a) After importing alloyed galvanised steel, explain the subsequent sales channel/use of the product. For example, do you on-sell the products to other Australian entities for their use (or further on-sale), or do you consume the goods in the manufacture of products by your company?
Used in the manufacture of steel pressings and sub assemblies for the Automotive industry.
- b) In general, are there any specific purpose(s) and/or end use(s) that alloyed galvanised steel you import is suitable for that non-alloy galvanised steel is not suitable for? Provide specific product details and supporting evidence where possible. **No**
- c) Are there any purpose(s) and/or end use(s) that non-alloy galvanised steel and alloyed galvanised steel can be used interchangeably for? **Not for products we manufacture. Material specifications are determined by our customer. Any change to material specification is determined by our customers.**
- d) If you use alloyed galvanised steel for the production of other goods by your company: **Only used in our Automotive products where the material specification is determined by our customer**
 - i. explain the use(s) of this alloyed galvanised steel;
 - ii. is non-alloy galvanised steel able to be used for this same use(s) (if not, please explain why).

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- e) If your company on-sells alloyed galvanised steel to other parties: **Not applicable. Steel is used by Precision and turned into automotive components.**
- i. describe the ultimate end use(s) of this alloyed galvanised steel;
 - ii. Is non-alloy galvanised steel able to be used for the same end use(s) as those described above (if not, please explain why).

4.4.2. Selling price

*If you on-sell the non-alloy galvanised steel and alloyed galvanised steel you import (i.e. do not consume in your own manufactured products), answer the following questions. **Not applicable. Steel is used by Precision and turned into automotive components.***

- a) Is there a difference in selling price to your Australian customers between non-alloy galvanised steel and alloyed galvanised steel, assuming all other factors of the sale were the same (e.g. order quantity, product characteristics such as steel grade, coating mass, thickness, credit terms). Provide details. **Not applicable**

I.e. are alloyed galvanised steel generally a different selling price to non-alloy galvanised steel due to the fact that it is an alloyed product? **Not applicable**

- b) If the answer to the above is yes, quantify the price difference for each year of the inquiry period. Provide any documents that support this price difference (e.g. price lists, comparable invoices, etc). **Not applicable**

4.4.3. General sales questions

*If you on-sell the non-alloy galvanised steel and alloyed galvanised steel you import (i.e. do not consume in your own manufactured products), answer the following questions. **The only steel we on sell is then purchased back by Precision and turned into automotive components***

- a) When on-selling alloyed galvanised steel, are your customer(s) aware of the fact that it contains alloys? Could your customer(s) reasonably be under the impression that they are purchasing non-alloy galvanised steel? **Not applicable**
- b) If your immediate Australian customer is not the end user of the alloyed galvanised steel you import, is it likely that the end user of those products is aware of the fact that it contains alloys? Could the end user reasonably be under the impression that they are purchasing non-alloy galvanised steel? **Not applicable**

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- c) Is the alloyed galvanised steel that you supply to your Australian customers described as 'alloyed' on any of the commercial or other documentation associated with that sale, including your offer for sale to your Australian customers? If so, please provide documentary evidence of this (invoice, purchase order, offer for sale, etc). **Not applicable**
- d) Do your customers of alloyed galvanised steel specifically request that the products you sell them contain alloys? Describe how and at what stage of the order process this occurs. **Not applicable**
- e) Is there a minimum order quantity to your customer(s) for: **Not applicable**
- i. non-alloy galvanised steel;
 - ii. alloyed galvanised steel?

If so, please specify what this quantity is.

- f) Are the models of alloyed galvanised steel that you imported and on-sold in Australia during the inquiry period part of your company's standard product offering to Australia, or are they only available under special circumstances (e.g. through special order)? Provide details. **Not applicable**

4.5. Open comments

If your company wishes to make any general comments about whether a circumvention activity has occurred (for the purposes as outlined in Regulation 48(2) of the *Customs (International Obligations) Regulation 2015*), it may take the opportunity to do so in response to this questionnaire.

Alternatively, separate submissions to the investigation may be made directly to the Commission at the following address:

The Director
Operations 2 - Anti-Dumping Commission
Department of Industry and Science
GPO Box 9839
Canberra, ACT 2601

or by email at operations2@adcommission.gov.au.

Interested parties wishing to participate in the inquiry must ensure that submissions are lodged promptly as legislative timeframes and restrictions apply to the receipt and consideration of submissions.

Refer to Australian Dumping Notices 2015/55 and 2015/69 for further information on these restrictions.

5. IMPORTER'S DECLARATION

I hereby declare that PRECISION COMPONENTS AUSTRALIA (company) have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this submission is complete and correct to the best of my knowledge and belief.

I hereby declare that.....(company) did not, during the period of inquiry, import the circumvention goods and therefore have not completed the attached questionnaire.

Name : KANE KERLEY

Signature : 

Position in Company : GENERAL MANAGER

Date : 14/7/15