



Australian Government
**Australian Customs and
Border Protection Service**

**INVESTIGATIONS INTO THE ALLEGED DUMPING OF ZINC
COATED STEEL AND ALUMINIUM ZINC COATED STEEL**

EXPORTED FROM

**THE PEOPLE'S REPUBLIC OF CHINA,
THE REPUBLIC OF KOREA AND TAWAIN**

IMPORTER VISIT REPORT

OneSteel Trading Pty Ltd

**THIS REPORT AND THE VIEWS OR RECOMMENDATIONS CONTAINED
THEREIN WILL BE REVIEWED BY THE CASE MANAGEMENT TEAM AND
MAY NOT REFLECT THE FINAL POSITION OF CUSTOMS AND BORDER
PROTECTION**

October 2012

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2 BACKGROUND AND PURPOSE

2.1 The application

On 3 August 2012, applications¹ were lodged on behalf of BlueScope Steel Limited (BlueScope) requesting that the Minister for Home Affairs (the Minister) publish dumping duty notices in respect of:

- zinc coated (galvanised) steel exported to Australia from the People's Republic of China (China), the Republic of Korea (Korea) and Taiwan; and
- aluminium zinc coated steel exported to Australia from China, Korea and Taiwan.

BlueScope alleges that the Australian industry has suffered material injury caused by galvanised steel and aluminium zinc coated steel (the goods) being exported to Australia from China, Korea and Taiwan at dumped prices.

On 17 August 2012² and 27 August 2012 additional information and data were received in respect of the applications. As a result, the Australian Customs and Border Protection Service (Customs and Border Protection) restarted the 20 day period for considering the applications.

On 5 September 2012, following consideration of the applications, the Chief Executive officer of Customs and Border Protection decided not to reject the applications and initiated investigations in the alleged dumping of galvanised steel and aluminium zinc coated steel from China, Korea and Taiwan. Public notifications of initiation of the investigations were published in *The Australian* on 5 September 2012. Australian Customs Dumping Notice No. 2012/40 provides further details of the investigations and is available at www.customs.gov.au.

2.2 Anti-dumping investigations and measures for zinc coated steel and aluminium zinc coated steel

2.2.1 Investigations

There have been no recent dumping or countervailing investigations in respect of galvanised steel or aluminium zinc coated steel products.

2.2.2 Anti-dumping measures for zinc coated steel and aluminium zinc coated steel

There are no current anti-dumping or countervailing measures on galvanised steel and /or aluminium zinc coated steel exported to Australia from China, Korea and Taiwan.

¹ *Application for Dumping Duties for Galvanised Steel exported from China, Korea and Taiwan* (Galvanised Steel Application) received on 3 August 2012; and *Application for Dumping Duties for Aluminium Zinc Coated Steel exported from China, Korea and Taiwan* (Aluminium Zinc Coated Steel Application) received on 3 August 2012.

² Additional information relating to minor issues was also provided on 20 and 21 August 2012.

2.3 Background to meeting

2.3.1 Preliminary matter – identification of Arrium group entities

Following the initiation of the investigations, a search of Customs and Border Protection's import database indicated that OneSteel Australian Tube Mills Pty Ltd ATM (here after referred to as OneSteel ATM) and OneSteel Trading Pty Ltd (hereafter referred to as OneSteel Trading) imported the goods under investigation during 1 July 2011 to 30 June 2012 (the investigation period).

Prior to the meeting Customs and Border Protection were aware that the three affiliated entities trading under the 'OneSteel' brand - OneSteel Trading, OneSteel ATM and an entity trading as One Steel Coil Coaters Pty Ltd (hereafter referred to as OneSteel Coil Coaters) - are involved in commercial operations associated with the importation of the GUC.

After discussions with these entities, we ascertained that:

- OneSteel ATM is an importer of galvanised steel;
- OneSteel Trading is an importer of galvanised and aluminium zinc coated steel; and
- OneSteel Coil Coaters use aluminium zinc coated steel in their manufacturing processes.

We understand that the abovementioned three commercial entities are part of a corporate group of companies wholly owned by a single corporate entity, Arrium Limited (formerly OneSteel Limited). The corporate structure of Arrium Limited (and the relevant OneSteel entities for the purposes of the present investigations) is explained in greater detail below.

Customs and Border Protection confirmed from the Customs and Border Protection's database that the entities identified, when viewed as a composite group by virtue of shared corporate ownership, were a major³ importer of galvanised steel and were a minor importer of aluminium zinc coated steel.

Prior to the meeting it was unclear whether OneSteel Coil Coaters was an importer of the GUC. Through discussions with the representatives present at the meeting, the relevance of OneSteel Coil Coater's commercial operations in relation to the importation of the GUC was clarified. We have articulated Customs and Border Protection's views on the relevance of OneSteel Coil Coaters, for the purposes of the relevant investigations, in a separate report.

2.3.2 Treatment of identified related entities for the purposes of the meeting

³ For the purpose of this report, a major importer is defined as an importer which imported more than 5% of the total volume of imports from the countries subject to the investigations.

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Customs and Border Protection notified each separate entity individually of the initiation of the investigations and sought their cooperation with the investigations and provided an importer questionnaire in respect of aluminium zinc coated steel and/or galvanised steel to the company to complete, where applicable.

Whilst each entity provided separate responses to the questionnaire provided, as applicable to its particular commercial operations, Customs and Border Protection conducted a single verification visit at which representatives of all three entities were present.

The entities confirmed that, as a result of the shared corporate ownership structure under which they operated, there were no issues of confidentiality associated with the treatment of three entities as a composite group under the corporate umbrella of Arrium Limited for the purposes of the meeting.

For the sake of efficiency, the meeting was conducted to cover both products under investigation, however the focus of verification differed in relation to each specific entity present at the meeting, as applicable in relation to the specific commercial operations of each entity.

2.3.3 Treatment of OneSteel entities for reporting purposes

Notwithstanding the above, we recognise that each of the relevant OneSteel entities present at the meeting is involved in separate commercial activities which relate to distinct downstream markets. In summary we clarified at the meeting that:

- OneSteel Trading is appropriately categorised as an importer and distributor of galvanised steel and aluminium zinc coated steel;
- OneSteel ATM is an importer of Hot Rolled galvanised Coil, but is appropriately categorised wholly as an end user of both goods; and'
- OneSteel Coil Coaters is an end user of imported aluminium zinc steel, which it procures from [REDACTED] but is not itself an importer of the goods.

The representatives of the above entities emphasised that, notwithstanding their mutual commercial association by virtue of ownership by Arrium Limited and identification within the portfolio of Arrium Limited entities trading with the 'OneSteel' brand, each entity had a different relationship with the goods and different perceptions in relation to the key issues associated with the anti-dumping investigations.

On this basis separate reports have been prepared for each entity outlining the process of verification undertaken in relation to the particular commercial operations of the relevant entity. This report pertains specifically to OneSteel Trading.

2.3.3 Information specific to OneSteel Trading

OneSteel Trading was provided with a list of its imports of galvanised and aluminium zinc coated steel during the investigation period, extracted from Customs and Border Protection's import database, with selected consignments for further verification to source documentation.

OneSteel Trading completed the importer questionnaire, providing details regarding the company, overseas supplier information, imports and importation and selling expenses. A copy of Part A (company and supplier details) of OneSteel Trading importer questionnaire response is at **Confidential Attachment GEN 1**.

2.4 Purpose of meeting

The purpose of this visit was to:

- confirm that OneSteel Trading was an importer of galvanised steel and obtain information to assist in establishing the identities of the exporters of the goods;
- verify information on imports of aluminium zinc coated steel and galvanised steel to assist in the determination of export prices from [REDACTED];
- establish whether the export purchases were arms-length transactions;
- establish post exportation costs incurred in importing;
- identify OneSteel Trading's sales and customers and determine sales volume, selling prices and costs;
- recommend how export price may be determined under section 269TAB of the *Customs Act 1901*⁴; and
- provide OneSteel Trading with an opportunity to discuss any issues relevant to the investigations.

Prior to the meeting Customs and Border Protection forwarded an agenda to the key contact handling the administration of the meeting on behalf of all three entities, and advised that we would require supporting documentation for the selected consignments for each entity, including OneSteel Trading, that had been identified prior to the visit. A copy of the visit agenda is at **Confidential Attachment GEN 2**.

2.5 Visit

Details of the visit were as follows:

Company:	OneSteel Trading
Address:	Level 8 205 Pacific Highway, St Leonards, NSW
Telephone no:	02 9681 6811
Fax no:	02 9681 6161

⁴ Herein all references to legislation in this report refer to the *Customs Act 1901*, unless otherwise specified

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Visit date:	Thursday 18 October 2012
Present at the visit	
OneSteel Trading	Glenn Szecsodi – Procurement & Supply Chain Manager
Customs and Border Protection	Mr Mick Kenna, A/G Director Operations 2 Ms Cathy Cole, Supervisor Operations 1 Mr Edward Macgregor, Supervisor Operations 1

We note that Mr Josh Harslett, Steel in Concrete Value Chain Manager for OneSteel Market Mills, was providing support for all three entities in relation to the provision of responses prior to the meeting and all relevant correspondence thereafter. Mr Harslett was present at all stages of the meeting.

At the meeting Customs and Border Protection provided a summary of the investigation process and timeframes as follows (highlighting that the following process and timeframes are for both galvanised steel and aluminium zinc coated steel):

- investigation period is 1 July 2011 to 30 June 2012;
- Customs and Border Protection will examine the Australian market from July 2007 for the purpose of analysing the condition of the Australian industry;
- initial submissions from interested parties are due by 15 October 2012 (in response to the applications and initiation notice);
- a preliminary affirmative determinations (PADs) may be made no earlier than 5 November 2012 (after day 60 from the date of initiations);
- provisional measures may be imposed at the time of the PADs or at any time after the PADs have been made, but Customs and Border Protection would not make such a determination until it was satisfied that there appears to be, or that it appears there will be, sufficient grounds for the publication of dumping duty notices;
- a statement of essential facts (SEF) for respective investigations will be placed on the public record by 24 December 2012 or such later date as the Minister allows;
- the SEF will set out the material findings of fact on which Customs and Border Protection intends to base its recommendations to the Minister and will invite interested parties to respond, within 20 days, to the issues raised (submissions received in response to the SEF will be considered when compiling the report and recommendations to the Minister);
- Customs and Border Protection's report to the Minister is due by 7 February 2013, unless an extension to the SEF is approved by the Minister;
- the Minister will have 30 days from the date of receipt of the final report to make a final decision; and
- certain interested parties have the right to seek a review to the Trade Measures Review Officer in relation to the Minister's decision.

OneSteel Trading has been recently visited by Customs and Border Protection for the concurrent investigation into the alleged dumping of hot rolled coil (HRC) exported from Japan, Korea, Malaysia and Taiwan (Investigation No. 188 refers).

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Therefore, OneSteel Trading was familiar with the anti-dumping investigation process.

OneSteel Trading was co-operative and had the required documentation available for the meeting. OneSteel Trading confirmed that it has access to Customs and Border Protection's Electronic Public Record and is able to access relevant information for the investigations.

2.6 Visit report

Customs and Border Protection advised OneSteel Trading that:

- a '*For Official Use Only*⁵' report on the visit will be prepared;
- OneSteel Trading would be given an opportunity to review the visit report for accuracy; and
- a public record version of this visit report would then be prepared in consultation with OneSteel Trading and placed on the Public Record for the investigation.

At the outset of the meeting, Customs and Border Protection advised OneSteel Trading that the applications in respect of galvanised steel and aluminium zinc coated steel are treated as two separate applications. Therefore two separate investigations are being conducted. Investigation No. 190A refers to galvanised steel and Investigation No. 190B refers to aluminium zinc coated steel.

Customs and Border Protection advised that this approach and treatment of the applications may vary during the course of the investigation process as further analysis is conducted of the goods and the markets in which they operate.

⁵ Which replaces the previously used security classification of "*Confidential*".

3 THE GOODS

3.1 The goods the subject of the applications

Description

(i) Galvanised steel

The imported goods the subject of the Galvanised Steel Application are:

“flat rolled products of iron and non-alloy steel of a width less than 600mm and, equal to or greater than 600mm, plated or coated with zinc”⁶.

The goods the subject of this application (the goods) are generically called galvanised steel (referring to zinc coated steel). The application covers galvanised steel of any width. The application stated that trade and other names often used to describe galvanised steel, include:

- “GALVABOND®” steel;
- “ZINCFORM®” steel;
- “GALVSPAN®” steel;
- “ZINCHITEN®” steel;
- “ZINCANNEAL” steel;
- “ZINCSEAL” steel;
- Galv;
- GI;
- Hot Dip Zinc coated steel;
- Hot Dip Zinc/iron alloy coated steel; and
- Galvanneal.

The application noted that the amount of zinc coating on the steel is described as its coating mass and is nominated in grams per meter squared (g/m²) with the prefix being Z (*Zinc*) or ZF (*Zinc converted to a Zinc/Iron alloy coating*). The applicant claims that the common coating masses used for zinc coating are: Z350, Z275, Z200, Z100, and for zinc/iron alloy coating are: ZF100, ZF80 and ZF30 or equivalents based on international standards and naming conventions.

(ii) Aluminium zinc coated steel

The imported goods the subject of the Aluminium Zinc Coated Steel Application are:

*“flat rolled products of iron and non-alloy steel of a width equal to or greater than 600mm, plated or coated with aluminium-zinc alloys, **not painted** whether or not including resin coating”⁷.*

⁶ Galvanised Steel Application, page 10.

⁷ Aluminium Zinc Coated Steel Application, page 10.

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The goods the subject of this application are generically called aluminium zinc coated steel. The application stated that trade and other names often used to describe aluminium zinc coated steel, include:

- ZINCALUME® steel;
- GALVALUME® steel;
- Aluzinc, Supalume, Superlume, ZAM, GALFAN;
- Zinc aluminium coated steel;
- Aluminium zinc coated steel;
- Alu-Zinc Steel sheet in Coils;
- Al/Zn; and
- Hot Dipped 55% Aluminium-Zinc Alloy coated steel sheet in coil.

The application noted that the amount of aluminium zinc coating on the steel is described as its coating mass and is nominated in g/m² with the prefix being AZ (*Aluminium Zinc*). The applicant claims that the common coating masses used are: AZ200, AZ150, AZ100, and AZ70.

Product standards

The applications stated that:

“Typically each Australian and International Standard has a range of steel grades nominated as Commercial, Formable or Structural grades. The commercial/formable grades are those with mechanical properties suitable for general pressing and forming whereas the structural grades are those with guaranteed minimum properties that structural engineers utilize in the design of their final product designs”⁸.

(i) Australia

The applications state that the Australian and New Zealand Standard Industrial Classification Code applicable to galvanised steel and aluminium zinc coated steel is category 2711.

(ii) International

The applications state that there are a number of relevant International Standards for galvanised steel and aluminium zinc coated steel products (figures 1 and 2 refer) that cover a range of products through specific grade designations, including the recommended or guaranteed properties of each of these product grades.

⁸ Galvanised Steel Application, page 12.

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International Standards	Product Grade Names
<i>General and Commercial Grades</i>	
AS/NZS 1397	G1, G2
ASTM A 653/A 653M	CS type A, B and C
EN10346	DX51D, DX52D
JIS 3302	SGCC, SGHC
<i>Forming, Pressing & Drawing Grades</i>	
AS/NZS 1397	G3
ASTM A 653/A 653M	FS, DS type A and B
EN10346	DX53D, DX54D
JIS 3302	SGCD, SGCD, SGCD
<i>Structural Grades</i>	
AS/NZS 1397	G250, G300, G350, G450, G500, G550
ASTM A 653/A 653M	33 (230), 37 (255), 40 (275), 50 (340), 55 (380), 80 (550)
EN10346	S220GD, S250GD, S280GD, S320GD, S350GD, S550GD
JIS 3302	SGC340, SGC400, SGC440, SGC490, SGC570 SGH340, SGH400, SGH440, SGH490, SGH570

Figure 1: International Standards for galvanised steel⁹

International Standards	Product Grades
<i>General and Commercial Grades</i>	
AS/NZS 1397	G1, G2
ASTM A792	CS, type A, B and C
EN10346	DX51D, DX52D
JIS 3321	SGLCC
<i>Forming, Pressing & Drawing Grades</i>	
AS/NZS 1397	G3
ASTM A792	FS, DS
EN10346	DX53D, DX54D
JIS 3321	SGLCD, SGLCDD
<i>Structural Grades</i>	
AS/NZS 1397	G250, G300, G350, G450, G500, G550
ASTM A792	33 (230), 37 (255), 40 (275), 50 (340), 55 (380), 80 (550)
EN10346	S220GD, S250GD, S280GD, S320GD, S350GD, S550GD
JIS 3321	SGLC400, SGLC440, SGLC490, SGLC570

Figure 2: International Standards for aluminium zinc steel¹⁰

Tariff classifications

(i) Galvanised steel

The application states that galvanised steel is classified to tariff subheadings 7210.49.00 (and statistical codes 55, 56, 57 and 58) and 7212.30.00 (and statistical code 61) of Schedule 3 to the *Customs Tariff Act 1995* (Tariff Act). Based on the information provided in the application, Customs and Border Protection's Trade

⁹ Galvanised Steel Application, page 11.

¹⁰ Aluminium Zinc Coated Steel Application, page 11.

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Policy Branch confirmed that galvanised steel is correctly classified to these tariff subheadings.

The general rate of duty is currently 5% for goods imported under these tariff subheadings. Imports from China are subject to the DCS duty rate which is free. Imports from Korea and Taiwan are subject to the DCT duty rate which is 5%.

There are several Tariff Concession Orders (TCOs) applicable to the relevant tariff classification subheading 7210.49.00, which covers galvanised steel (figure 2 refers).

TC No.	Description
TC 0939596	STEEL, COIL, hot dip zinc coated, complying with Japanese Industrial Standard JIS G 3302:2007, having ALL of the following: (a) yield strength NOT less than 275 N/mm ² and NOT greater than 380 N/mm ² ; (b) tensile strength NOT less than 440 N/mm ² ; (c) elongation NOT less than 29% and NOT greater than 41%; (d) coating mass NOT less than 45 g/m ² and NOT greater than 65 g/m ² ; (e) thickness NOT less than 1.14 mm and NOT greater than 1.26 mm; (f) width NOT less than 1590 mm and NOT greater than 1605 mm
TC 9612218	STEEL, flat rolled non alloy, hot dipped galvanized, having ANY of the following: (a) differential coating mass on each side; (b) additional iron base alloy electroplated outer coatings; (c) width exceeding 1525 mm; (d) a minimum ultimate tensile strength of 340 MPa

Figure 3: TCOs applicable to tariff subheading 7210.49.00

Customs and Border Protection notes that the applications did not specify that TCOs in respect of the goods were applicable. Customs and Border Protection considers the relevance of the TCOs to the goods the subject of the application for galvanised steel requires further investigation.

(ii) Aluminium zinc coated steel

The application states that aluminium zinc coated steel is classified to tariff subheading 7210.61.00 (and statistical codes 60, 61, and 62) of Schedule 3 to the Tariff Act. Based on the information provided in the application, Customs and Border Protection's Trade Policy Branch confirmed that the goods are correctly classified to this tariff subheading.

The general rate of duty is currently 5% for goods imported under this tariff subheading. Imports from China are subject to the DCS duty rate which is free. Imports from Korea and Taiwan are subject to the DCT duty rate which is 5%.

There are no TCOs applicable to the relevant tariff classification subheading for aluminium zinc coated steel.

3.2 'Like' goods

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OneSteel Trading agreed that galvanised steel and aluminium coated steel manufactured by Bluescope appeared to be like goods to the goods the subject of the application that it imports.

4 COMPANY BACKGROUND

4.1 Company background

4.1.1 General background

As mentioned above, OneSteel Trading (along with OneSteel ATM and OneSteel Coil Coaters) is a separately registered entity under the corporate umbrella of Arrium.

Arrium is a publicly listed company, registered in Australia that was spun out from BHP Billiton in 2000. Arrium was formerly named OneSteel Limited. OneSteel Limited changed its name to Arrium with effect from 2 July 2012.

The OneSteel representatives present at the meeting provided a short presentation regarding the corporate structure of Arrium Limited and the relevant position of OneSteel branded business within this structure.

In summary, we note that Arrium comprises 3 major divisions:

- Arrium Mining;
- Arrium Mining Consumables; and
- OneSteel Steel and Recycling.

Onesteel Steel and Recycling is the relevant division under which the three abovementioned commercial entities operate. We note that, despite the change in name of the parent corporate entity, 'OneSteel' is still the commercially used, and recognised, trading name associated with the various operations that fall within the Steel and Recycling division and specifically in relation to those operations that relate to the GUC.

We understand that OneSteel Steel and Recycling division comprises three internal subdivisions, each of which in turn comprises a number of specific, separately registered and operated business entities. The subdivisions are:

- OneSteel Distribution;
- OneSteel Manufacturing; and
- OneSteel Recycling

We clarified that each division (and composite business entities within that fall under each limb) are delineated by the commercial services that the entities within each perform.

For completeness, we confirmed that

- OneSteel Distribution (OneSteel Trading Ltd) is responsible, inter alia, for the distribution of steel and related products. The portfolio of businesses under

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the division use separate selling, distribution and supply chains to deliver products and services to Australian customers. This division comprises a number of distinct businesses including those trading under the names OneSteel Sheet and Coil and OneSteel Coil Coaters)

- OneSteel Manufacturing comprises operational facilities and business entities associated with the manufacture of the array of steel products within OneSteel Steel's product catalogue (which are distributed via the network of entities within OneSteel Distribution and third party businesses). This division comprises, amongst others, OneSteel ATM.
- OneSteel Recycling is responsible for the supply of raw materials for steelmaking to domestic and overseas steelmaking facilities. We confirmed that this division is unrelated to the importation of the GUC.

We understand that the corporate structure within the divisions is complex, however, for the purposes of the investigation, it is enough to summarily understand that all sub-divisions (and the entities within each) are recognised as wholly owned entities of Arrium.

4.1.2 Functions of OneSteel Trading

Corporate structure

We clarified that OneSteel Trading Ltd is the holding company for the wider group of distribution businesses including those trading as OneSteel Sheet and Coil and OneSteel Coil Coaters We note that the representative present at the meeting on behalf of OneSteel Trading formally identified themselves as an employee of OneSteel Sheet and Coil.

For the sake of consistency, for the purposes of this report, references to OneSteel Trading are to be taken to refer to OneSteel Sheet and Coil.

At the visit OneSteel Trading gave a short summary of its commercial operations. A copy of the material provided is included as **confidential attachment GEN 3**.

Commercial operations

OneSteel Trading described itself as an importer and distributor of a range of steel products including Hot Rolled Coil steel plate and sheets as well as steel piping products. OneSteel Trading represents itself as one of Australia's largest distributors of flat rolled products.

OneSteel Trading submitted that it distributes steel products to a number of key market segments in Australia including:

- Residential and non residential construction;
- Manufacturing;
- Transport & Distribution;

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- Engineering and Civil Construction;
- Mining; and
- Oil & Gas.

OneSteel Trading has over [REDACTED] employees, within its distribution business.

We understand that the variety of products distributed by OneSteel Trading are produced through seven service centres and manufacturing operations in Australia which provide a number of intermediate functions in relation to imported goods (and domestically sourced products) including the GUC.

We clarified that OneSteel Trading is responsible for the procurement, and associated supply chain management, of steel products from domestic and overseas suppliers. Specifically, in relation to the GUC, we understand that OneSteel Trading sources both galvanised hot rolled coil and galvanised cold rolled coil from domestic and overseas suppliers, which is processed (slit, cut and flat rolled) for distribution.

OneSteel Trading administers a large distribution network via Metaland. Metaland is owned by Arrium and acts as a regional distributor of OneSteel Trading's products to smaller regional based customers.

Products

OneSteel Trading estimated that the GUC account for approximately [REDACTED]% of the total turnover for the distribution business.

OneSteel Trading advised that, on average, roughly [REDACTED]% of all galvanised and aluminium zinc coated steel it procures for distribution in Australia is provided by the applicant. OneSteel Trading explained that the proportion of locally sourced product, relative to the quantity of imported product will vary slightly depending on the competitive offers available from each respective supply source at the relevant time.

OneSteel Trading advised that of the total volume of the GUC it procures annually, it is, on average, comprised of [REDACTED]% galvanised steel and [REDACTED]% aluminium zinc coated steel.

OneSteel Trading further advised that the significant majority of imported galvanised steel is distinguished in compliance with JIS G 3302 SGCC Z27 grade, which, we understand to be equivalent to commercial quality galvanised standard. The majority of aluminium zinc coated steel imported during the period of investigation was predominantly grades [REDACTED] or [REDACTED]

4.2 Accounting

OneSteel Trading explained that it uses SAP system for all purchasing, maintenance, accounts payable, the fixed assets register, and inventory valuation

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OneSteel Trading has a financial year of 1 July to 30 June. OneSteel ATM's financial statements are consolidated into the annual statements of Arrium, which are audited annually.

4.3 Relationship with suppliers

OneSteel Trading claimed that they are not related or affiliated in any way with either of their suppliers in [REDACTED]. We discovered no evidence that would contradict this representation.

For completeness, we note that OneSteel Trading provided a copy of a commercial contract executed with one of its major suppliers [REDACTED]. We noted that, prima facie, the commercial terms of supply reflected in the document do not appear to be influenced by any relationship or affiliation between the entities. This document is attached as **confidential attachment GEN 4**.

4.4 Relationships with customers

As part of its response to the importer questionnaire, OneSteel Trading provided a sales listing reflecting all sales to customers in Australia during the period of investigation which could unequivocally be determined to be sales of imported GUC.

From this listing we identified that OneSteel Trading sold to over [REDACTED] different customers during the period of investigation. OneSteel Trading stated that it sells to [REDACTED] as well [REDACTED] [summary of levels of trade with respect to OneSteel Trading's Australian customers]

OneSteel Trading advised that it does not have any association or affiliation with its Australian customers, beyond ongoing commercial relationships for the supply of the GUC.

As a caveat to the above statement, OneSteel Trading advised that roughly [REDACTED]% of its sales of the GUC are made to Metaland. As explained above, Metaland is owned by Arrium and acts as a regional distributor of OneSteel Trading's products.

OneSteel Trading stated that GUC are supplied to Metaland sometimes through [REDACTED] and sometimes on the basis of a [REDACTED] [description of sales arrangements between OneSteel Trading and Metaland]

5 IMPORTS

5.1 Introduction

5.1.1 Overview

OneSteel Trading imported a total of [REDACTED] tonnes of aluminium zinc coated steel from [REDACTED] registered in [REDACTED] during the investigation period¹¹.

OneSteel Trading also imported roughly [REDACTED] tonnes of galvanised steel during the investigation period from suppliers in [REDACTED] as well as from [REDACTED] other countries not within the scope of this galvanised steel investigation. We confirmed that [REDACTED] tonnes ([REDACTED]% of total imported volume) was imported from [REDACTED].

The table below summarises OneSteel Trading’s imports of each GUC, by supplier and country for the period of investigation:

Supplier	Good	Country	Import quantity (MT)
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
TOTAL			[REDACTED]

5.1.2 Summary

We viewed the available import data and noted that:

- Galvanised steel accounted for the [REDACTED] of all imports by OneSteel Trading from the subject countries of export during the period of investigation (over [REDACTED]% of total imported volume);

¹¹ For completeness we note that [REDACTED] from which Aluminium Zinc Coated steel is sourced by OneSteel Trading (see below), is a [REDACTED]. OneSteel Trading advised that, to the best of its knowledge, all of the Aluminium Zinc Coated Steel flat rolled product provided by [REDACTED] [details of commercial activities of specific supplier]

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- The total imports of aluminium zinc coated steel account for █% of the total volume of GUC imported during the period of investigation; and
- The significant majority of galvanised steel imported by OneSteel Trading was supplied by one supplier- █ - (█% of total imported volume).

5.2 Ordering process and price

5.2.1 Ordering process

OneSteel Trading procures the GUC based on demand forecasts for key consuming industries of galvanised and aluminium zinc coated steel. This is developed from a combination of █ of likely customer requirements which is informed by ongoing dialogue directly with customers. OneSteel Trading advised that it seeks to tentatively forecast supply for █ months.

The demand forecast is converted into a supply plan, which is a high level planning model distinguishing the specific quantities, grades and specifications to be procured.

OneSteel Trading advised that a core concern for its supply chain management is to ensure procurement of goods from sources of supply that enable █ in the Australian market [general description of pricing strategies].

As such, OneSteel Trading explained that the source of supply subject to the supply plan is determined on the basis of █ provided by the applicant, which are then compared to the relevant █.

5.2.2 Price

OneSteel Trading advised that its overseas suppliers provide █ price offers with respect to the base price of particular products. OneSteel Trading then negotiates with the supplier with respect to quantities and specifications required on the basis of the offered price. OneSteel Trading advised that whilst there is some fluidity with respect to the offered █ price, the final negotiated price █ from the offered price [general statements regarding price negotiation].

The actual price of relevant orders is then negotiated with respect to the █ price taking into account █ applying to different █.

The █ price is usually for the standard thicknesses, which are █. OneSteel Trading submitted that the ratio between the thickness of the steel (the substrate) relative to the zinc coating has the most significant impact on the price of the product relative to the negotiated base price. In short, the purchase █ with the ratio of coating thickness to substrate thickness as the relative proportion of Zinc to Steel being supplied █ [explanation of price differences relative to specific product variances].

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OneSteel Trading advised that product thickness is determined in different ways in order to specify products. Specifically, we were advised that the Australian standard is to measure the thickness of coil or flat rolled products by the thickness of the substrate steel (base metal thickness), whereas overseas suppliers will sometimes specify thickness in terms of the total thickness inclusive of the coating on the substrate (total coated thickness).

The [REDACTED] price applies to all thicknesses about [REDACTED]. A \$ [REDACTED] premium applies to products with a thickness below [REDACTED].

OneSteel Trading also explained that there is an average \$ [REDACTED] unit premium charged by overseas and domestic mills for aluminium zinc product, in comparison to galvanised.

OneSteel Trading provided evidence of price offers and extras tables from one of its suppliers in [REDACTED]. These documents are at **confidential attachment IMP 1(a)**.

5.2.3 Shipment

Once produced, the coil is strapped along the circumference and diameter of the coil, covered in an oiled paper coating and then strapped again using steel sheet before being transported to the port of export.

OneSteel Trading advised that the majority of shipments are made in break bulk (BBK) form (non-containerised cargo) or Full Container Load (FCL) form in container ships and shipped to Australia.

All sales are negotiated in US Dollars (USD) on either a CIF (cost, insurance and freight), FOB (free on board) or CFR (cost and freight) basis. Payment terms are [REDACTED].

5.3 Verification

Prior to the visit, we selected [REDACTED] shipments so that OneSteel Trading could provide Customs and Border Protection the following source documents, where applicable:

- commercial invoices;
- packing lists;
- purchase orders;
- bills of lading; and
- Customs broker and domestic freight invoices.

In relation to the selected shipments, OneSteel Trading also provided:

- proof of payment to supplier: and
- evidence of payment of importation costs.

The source documents are at **Confidential Attachment IMP 1(b)**

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Reconciliation to source documents (accuracy)

From the importer transaction spreadsheet we were able to reconcile the shipment number, order number, quantity, price and packing list with the source documentation provided in relation to each selected shipment.

Invoices were in USD and we confirmed that shipments were invoiced on either a CIF, FOB or CFR basis.

We confirmed that the listed credit terms were correct.

OneSteel Trading hedges the currency for the majority of purchases and provided copies of [REDACTED] foreign exchange for the relevant period (**Confidential Attachment IMP 2**). We matched the hedging rate from this document to the exchange rate used in the importer transaction form for [REDACTED] shipments.

For the [REDACTED] shipments, OneSteel Trading paid the [REDACTED] and we were able to match the exchange rate used in the importer transaction form to the relevant letter of credit for [REDACTED] shipment and as per the Reserve Bank of Australia exchange rate for the remaining shipment.

Supplier invoice details

Prior to the meeting we were provided proof of payment in relation to all selected shipments.

For each selected shipment we verified that OneSteel Trading paid the supplier the price reflected in the importation spreadsheet (on either a CIF, FOB or CFR basis). We confirmed from bank statements that payment is via international electronic funds transfer. We verified that the amount on the commercial invoice was the price paid and funds transferred by OneSteel Trading.

Shipping costs

Prior to the visit OneSteel Trading provided invoices for freight for each of the [REDACTED] selected shipments which matched the amounts recorded on the importer transaction form. We reviewed the proof of payment documentation provided by OneSteel ATM to Customs and Border Protection as part of the importer visit in respect of the hot rolled coil (HRC) steel investigation in July 2012 and we are satisfied that the freight costs are accurate.

OneSteel Trading also provided a copy of its marine insurance contract for the period 31 October 2011 to 31 October 2012 (**Confidential Attachment IMP 3**) showing a rate of [REDACTED]% of the value of the shipment.

The following table shows the weighted average shipping costs for the [REDACTED] selected shipments. Our working is at **Confidential Attachment IMP 4**.

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Item	Average cost \$AU/T
Overseas Freight	[REDACTED]
Insurance	[REDACTED]
TOTAL	[REDACTED]

Importation costs

Under the heading of ‘Australian Importation Costs’ on the importer transaction form, OneSteel trading entered amounts for customs duty, port service charges, terminal handling charges, customs entry fees, customs broker fees, AQIS delivery, bank charges and commission.

We compared the amounts provided with the relevant importation cost invoices to the importer transaction form and found the detail matched. We also verified the proof of payment provided for importation costs.

All importation charges relevant to specific purchase orders were incurred by a third-party agency who then submitted a commercial invoice to OneSteel Trading for the total value of costs incurred.

Prior to the visit we were provided with, proof of payment of importation costs for the majority of shipments. We were able to confirm that OneSteel Trading paid the amount reflected in the commercial invoice to the third-party provider identified on the invoice.

On the basis of the above verification, we are satisfied that the importer transaction spreadsheet is complete, accurate and reliable.

Using the verified data in the importer transaction form, weighted average importation costs in \$AU/Tonne have been calculated in the table below.

Item	Average cost \$AU/T
Port charges	[REDACTED]
Customs entry & broker fees	[REDACTED]
Delivery	[REDACTED]
Bank charges	[REDACTED]
Commission	[REDACTED]
Other (quarantine and survey charges)	[REDACTED]

Total	
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5.4 Selling, general and administrative (SG&A) costs

We noted on the importer transaction form that OneSteel Trading calculated selling, general and administration (SG&A) costs for each of the selected shipments based on an estimate of [REDACTED] % of sales revenue.

OneSteel Trading demonstrated using their financial management accounts, how it divided total expenditure for the GUC by total revenue for GUC for the investigation period to derive the SG&A cost. (See **Confidential Attachment IMP5**).

The SG&A costs included payroll and other expenses such as utilities, property costs, advertising and promotion, travel and other general office expenses. From the documents that OneSteel Trading provided we were able to reconcile the SG&A costs to the amount recorded on the importer transaction form. We were also able to reconcile sales quantities and revenues in the management accounts to listings of sales by product. (See **Confidential Attachment IMP 6**)

5.5 Export prices for shipments

Based on verification of all [REDACTED] shipments, we calculated the weighted average FOB unit export price (in AUD) for galvanised steel over the investigation period to be \$[REDACTED] per tonne. To arrive at FOB export prices for those shipments that were CIF we deducted the freight rates stipulated on the commercial invoice for each shipment as well as an amount for insurance. For the [REDACTED] that was CFR we deducted an amount for freight. Our working is at **Confidential Attachment IMP 7**.

5.6 Who is the importer

We noted that OneSteel Trading:

- is named as the customer on supplier invoices;
- is named as the consignee on the bill of lading; and
- pays for delivery of the goods to the customer.

On this basis, we consider OneSteel Trading were the beneficial owner of the goods at the time of importation and is therefore the importer.

5.7 Who is the exporter?

Customs and Border Protection will generally identify the exporter as:

- a principal in the transaction located in the country of export from where the goods were shipped who gave up responsibility by knowingly placing the goods in the hands of a carrier, courier, forwarding company, or their own vehicle for delivery to Australia; or

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- a principal will be a person in the country of export who owns, or who has previously owned, the goods but need not be the owner at the time the goods were shipped.

Where there is no principal in the country of export Customs will normally consider the exporter to be the person who gave up responsibility for the goods as described above.

Upon review of the documentation provided we are satisfied that:

- the commercial invoices identify the supplier;
- the bills of lading identify the supplier as the shipper of the goods; and
- the supplier arranges and pays for the goods to be transported to the wharf and loaded onto the ship in the country of export; and
- OneSteel Trading pays the relevant supplier.

We note that, whilst all the selected shipments verified during the visit related to transactions between OneSteel Trading and suppliers who were the manufacturer of the goods in question, OneSteel Trading has identified that [REDACTED] [information relating to the commercial operations of a specific supplier].

Typically, where transactions involve a trading entity who, in consideration of all relevant circumstances of the transaction, performs an intermediary or facilitative role in relation to the exportation of the GUC, the manufacturer of the goods will be seen to be the exporter. Whilst, prima facie, beneficial ownership of the goods may vest with the identified traders at the point of exportation, Customs and Border Protection does not regard ownership as conclusive when identifying the exporter.

On the basis of the above, we are satisfied, in relation to the identified trading entities, that the exporter of the goods are the manufacturers of the goods as identified by OneSteel Trading.

In summation, based on the information available we are satisfied that the following entities are the exporters of the goods:

- [REDACTED];
- [REDACTED];
- [REDACTED];
- [REDACTED].

6 AUSTRALIAN MARKET AND SALES

6.1 General

OneSteel Trading stated that the Australian market for HRC coil and sheet generally, and specifically in relation to the GUC, is going through a historically weak period in the aftermath of the global economic downturn and ongoing economic instability. OneSteel Trading suggest that the main driver of this phenomenon is the decline in the commercial and residential construction markets which are, traditionally, the principle market segment into which the GUC is sold in Australia.

OneSteel Trading asserted that the applicant continues to dominate the market for the distribution of the GUC and, by virtue of this position, is the price setter in the coil and sheet market in Australia with respect to galvanised and aluminium zinc coated steel.

OneSteel Trading commented that Bluescope operates similar distribution operations to itself. It said that the Australian steel distribution market comprised [REDACTED] Bluescope-aligned distributors and [REDACTED] non Bluescope-aligned entities.

6.2 Ordering and sales process

OneSteel Trading advised that its usual ordering and sales process for the goods is as follows:

- OneSteel Trading issues a [REDACTED] price list to its Australian customers ;
- OneSteel Trading is then contacted by its Australian customers to negotiate the price offer;
- Irregular orders outside the offered list are provided with a quote;
- Once the price is negotiated the customer issues a purchase order;
- OneSteel Trading's Australian customers pay OneSteel Trading according to agreed payment terms. These payment terms are [REDACTED] in which the goods were invoiced.

OneSteel Trading stated that because of the dynamic nature of the market for galvanised and aluminium zinc coil and sheet, it does not maintain contracts with customers to determine the price of goods. OneSteel Trading advised that it sets its prices to customers by monitoring trends in pricing reflected in the international base prices and price offers made by the applicant

6.3 Rebates and sales discounts

OneSteel Trading also stated that it offers [REDACTED] [summary of rebates and discounts offered by OneSteel Trading]

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Specifically, OneSteel Trading advised that [REDACTED] and [REDACTED] have [REDACTED] which are paid [REDACTED] either as a [REDACTED] [explanation of offers negotiated with specific customers].

6.4 Terms of sale

OneSteel Trading advised that it offers a range of credit terms to its Australian customers, which relate to the discount regime mentioned immediately above. We confirmed that the standard terms offered to the majority of customers are [REDACTED] [explanation of credit terms]

OneSteel Trading advised that specific 'internal' terms of credit are applied to all transactions between it and OneSteel distribution centres, which are transacted on the basis of cash sales

6.5 Delivery terms

We observed that a significant array of different delivery terms were designated for different sales reflected in the Australian sales listing provided by OneSteel Trading. We asked OneSteel Trading to explain the different terms of delivery applied in relation to sales of the GUC to its customers in Australia. We were advised that each of the different codes relates to different freight rates applied to sales.

Following discussion with OneSteel Trading regarding this issue we were satisfied that the difference in delivery terms is immaterial to the verification, on the basis that delivery terms are applicable irrespective of whether transactions comprise imported products or products sourced from the applicant.

6.6 Sales verification

6.6.1 Preliminary issue – completeness of data

As explained above, OneSteel Trading provided a listing of all sales of the GUC made to Australian customers during the period of investigation in circumstances in which it was clear from their internal sales records that the goods subject to the transaction were imported goods, rather than goods supplied by the applicant.

We were advised that OneSteel Trading had compiled this listing by tracing individual transactions of goods back to relevant purchase orders submitted to overseas suppliers – from which the supplier, and relevant country of origin could be determined for each sale on a line by line basis.

OneSteel Trading advised that the complete sales listing (comprising all sales made to Australian customers comprising both imported and domestically sourced product) was voluminous. OneSteel Trading also advised that there were some sales for which it was not possible to determine the origin of manufacture without systematic line by line reconciliation.

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To satisfy ourselves of the completeness of the sales listing provided, we requested and OneSteel Trading provided, an electronic copy of the full listing of all sales made during the POI. The complete listing is referred to as confidential attachment **SALES 1**¹². As mentioned in 5.5 above we were also able to reconcile sales quantities and revenues in the management accounts to listings of sales by product and, on this basis, are satisfied that the complete listing provided is a complete and accurate representation of OneSteel Trading's sales of the GUC.

Further, we were satisfied with the methodology by which OneSteel Trading had delineated the specific domestic sales which are definitively linked to imported GUC. On this basis we are satisfied that the sales listing provided is correct and complete for the purposes of our verification.

6.6.2 Verification to source documents

OneSteel Trading provided source documents relating to Australian sales identified to import purchase orders identified as pertaining to each of the eleven selected import shipments. These documents are at **confidential attachment SALES 2**

We used the source documentation provided in two ways.

Firstly, for each purchase order reflected in the import sales spread sheet we were able to verify the total quantity of the GUC reflected in the import sales sheet to the package of domestic sales. We consider this preliminary verification to support OneSteel Trading's claims with respect to its ability to definitely identify particular domestic sales, to relevant import transactions (see 6.6.1)

Secondly, we were able to trace the invoice details (value, quantity, invoice date, delivery terms and credit terms) of each individual invoice provided for each package (grouped by purchase order) to OneSteel Trading's Australian sales listing.

OneSteel Trading, in the first instance, provided a print out from its electronic accounting system, SAP, for each sales package as proof of payment for the invoice value of selected transactions. We were able to reconcile that the total composite sales value of the invoices was reflected in the sales records.

We raised concerns with OneSteel Trading about the veracity of the SAP summaries provided as proof of payment. To assure ourselves of the accuracy of the proof of payment summaries provided, we requested that OneSteel Trading provide, formal documentation for a randomly selected invoice (invoice 58015097). A copy of a formal transfer advice provided by ANZ-bank was provided by OneSteel Trading following the meeting. This document is attached as confidential attachment **SALES 3**. We were able to reconcile the value of the sampled invoice with the formal remittance advice provided.

¹² Given the size of the electronic sales listing file, it is incapable of being included as a physical attachment. A copy has been made and is saved under the relevant directory relating to the OneSteel verification visit.

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We are therefore satisfied that invoice details recorded in OneSteel Trading's sales listing are accurate, and that OneSteel Trading's customer paid the invoiced amounts for these transactions

6.7 Profitability of sales

As referred to above, OneSteel Trading submitted that their internal records were such that they could accurately identify relevant import shipments (identified by purchase orders) to individual sales transactions (or groups thereof). On this basis the total, and unit, sales revenue was calculated for each of the selected [REDACTED] shipments.

We used the actual revenue for each shipment to calculate the total profit for shipments (total selling price minus total cost to import and sell) in the importer transaction form.

This displayed that [REDACTED] selected sales were profitable. However, we observed that overall the shipments were [REDACTED].

6.8 Forward orders

The OneSteel Trading Importer Questionnaire response indicated that there were 39 applicable forward orders. We examined the orders and noted nothing of significance by way of source of supply, volume or price.

7 ARMS LENGTH

Section 269TAA outlines the circumstances in which the price paid or payable shall not be treated as arms' length. These are where:

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

As reflected in 6.7 above, when we applied the profitability test to the sample shipments we determined that on average, transactions between OneSteel Trading and its exporters of the GUC are unprofitable. When considering the relevance of this finding when forming a preliminary view as to whether the transactions were at arms' length, we took OneSteel Trading's submissions with respect to prevailing market pressures and increasing competitiveness of the market for the GUC.

We also note that we did not find any evidence that:

- there is any consideration payable other than price; or that
- the price is influenced by a commercial or other relationship between OneSteel Trading and its suppliers.

On the basis of the above we were not satisfied that unprofitable sales of themselves are sufficient evidence that the transactions are not appropriately deemed to be made at arms' length. As such, at this stage, subject to further investigation, we consider that sales between OneSteel Trading and the identified exporters were arms' length transactions.

8 DUMPING, MATERIAL INJURY AND CAUSATION

8.1 General

We asked OneSteel Trading to outline its views (if any) in relation to injury and causation with respect to both of the relevant investigations.

We note that, as OneSteel Trading distributes the goods to Australian customers at both end user and re-seller levels of trade in the exact form in which they are exported their perspective in relation to these issues is different to the views expressed by OneSteel ATM.

In summary, OneSteel Trading considers that the reduction in production capacity of the primary consuming industries with respect to coil and sheet steel (both galvanised and aluminium zinc coated) in Australia is a major factor in any injury experienced by the applicant in relation to GUC sales. OneSteel Trading are of the view that these factors are a far more significant injury factor than imports of the GUC, whether dumped or otherwise.

OneSteel Trading submit that the overwhelming majority of purchases of the GUC by Australian end users and re-sellers are from the applicant, rather than from imported sources.

OneSteel Trading further claimed that the rising cost of raw material used in the production of HRC has compressed the margins available to HRC producers.

9 UNSUPPRESSED SELLING PRICE

Unsuppressed selling price (USP) and non-injurious price (NIP) issues are examined at an early stage of an investigation and, where possible and appropriate, preliminary examinations are made during the application consideration period for the purpose of assessing injury and causal link and therefore the appearance of reasonable grounds for the publication of a dumping duty notice.

Customs and Border Protection generally derives the NIP by first establishing a price at which the applicant might reasonably sell its product in a market unaffected by dumping. This price is referred to as the USP.

Customs and Border Protection's preferred approach to establishing USPs observes the following hierarchy:

- industry selling prices at a time unaffected by dumping;
- constructed industry prices – industry cost to make and sell plus profit; or
- selling prices of un-dumped imports.

Having calculated the USP, Customs and Border Protection then calculates a non-injurious price by deducting the costs incurred in getting the goods from the export free on board point (or another point if appropriate) to the relevant level of trade in Australia. The deductions normally include overseas freight, insurance, into-store costs and amounts for importer expenses and profit.

At the time of the visit OneSteel Trading did not have any comments on the calculation of an USP or NIP.

10 RECOMMENDATIONS

As a result of the importer questionnaire submitted by OneSteel Trading and the verification conducted on site, we are of the opinion that the goods imported by OneSteel Trading are:

- goods that have been exported to Australia otherwise than by the importer;
- goods that have not been purchased by the importer from the exporter;
- purchases of the goods by the importer and its supplier were arm's length transactions

Subject to further inquiries with the exporter, we are satisfied that the export price can be established under s. 269TAB(1)(a) using the invoice prices less any costs in respect of matters arising after exportation in relation to imports of the GUC sourced directly from the following manufacturers:

- [REDACTED]
- [REDACTED]
- [REDACTED]

With respect to goods manufactured by [REDACTED] we are of the opinion that export price can be established under s269TAB(1)(c), being the price the Minister determines, having regard to all the circumstances of exportation.

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11 ATTACHMENTS

Confidential Attachment No.	Title
Confidential Attachment GEN 1	OneSteel Trading questionnaire response (part A)
Confidential Attachment GEN 2	Visit agenda
Confidential Attachment GEN 3	OneSteel Trading presentation
Confidential Attachment GEN 4	Copy of commercial contract
Confidential Attachment IMP 1 (a)	Evidence of base price offer and extra's cost tables
Confidential Attachment IMP 1 (b)	Source documents to support importer transaction form
Confidential Attachment IMP 2	Foreign exchange contract reports
Confidential Attachment IMP 3	Marine insurance contract
Confidential Attachment IMP 4	Calculation of shipping and importation costs
Confidential Attachment IMP 5	Calculation of SG&A expenses
Confidential Attachment IMP 6	Reconciliation of sales figures
Confidential Attachment IMP 7	Calculation of weighted average FOB export price
Confidential Attachment SALES 1	Complete sales listing
Confidential Attachment SALES 2	Australian sales source documents
Confidential Attachment SALES 3	Formal proof of payment documents