



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

R E P O R T

**TRADE MEASURES BRANCH
STATEMENT OF ESSENTIAL FACTS NO.192**

**REVIEW OF
ANTI-DUMPING MEASURES
PROCESSED DRIED CURRANTS
EXPORTED FROM
GREECE**

1 February 2013

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1. SUMMARY AND RECOMMENDATIONS

This review is in response to an application by Frutex Australia Pty Ltd (Frutex) seeking a review of the anti-dumping measures applying to processed, dried currants exported to Australia from Greece by a nominated single exporter – Agricultural Co-op Union Aeghion (Aeghion).

This statement of essential facts (SEF) sets out the facts on which the delegate of the Chief Executive Officer (the delegate) of the Australian Customs and Border Protection Service (Customs and Border Protection) proposes to base his recommendation to the Minister for Home Affairs (Minister) for measures applicable to processed, dried currants exported to Australia by Aeghion.

1.1 Proposed recommendation

The delegate proposes to recommend to the Minister that the dumping duty notice have effect in relation to Aeghion as if different variable factors had been ascertained with respect to exports of the goods to Australia, from Greece, by Aeghion.

The result of the review would be that ascertained export prices, normal values and the non-injurious price (NIP) for Aeghion would increase.

The effect of these increases would be that the NIP would be the operative measure (discussed in greater detail below). The NIP would operate to reflect a floor price would be set in relation to processed dried currants exported to Australia by Aeghion.

On the basis of contemporary export prices determined for the relevant review period, which have been found to be above the ascertained value of the NIP, interim dumping duties would only be payable on process dried currants exported by Aeghion, where future export prices were below the determined floor price.

1.2 Preliminary findings and conclusions

Based on all available information Customs and Border Protection's preliminary findings are:

- the export price for processed, dried currants by Aeghion has been determined under s.269TAB(1)(a) to be the price paid or payable for the goods by the importer.
- normal values for processed, dried currants have been determined under s.269TAC(1) based on domestic sales of like goods; and
- the non-injurious price for processed, dried currants can be established by using verified Australian industry data relating to sales of the goods during the review period plus relevant deductions and adjustments.

Based on these preliminary findings, and subject to any submissions received in response to this SEF, the delegate proposes to recommend to the Minister that the measures be varied to reflect contemporary variable factors.

1.3 Final report

The delegate's final report and recommendation in relation to measures applicable to processed, dried Currants exported from Greece by Aeghion must be provided to the Minister by **28 March 2013**.

PUBLIC RECORD

2. INTRODUCTION

2.1 Review process

If anti-dumping measures have been taken in respect of certain goods, an affected party may consider it appropriate to apply for a review of those measures as they affect a particular exporter or exporters generally.

Accordingly the affected party may apply for, or the Minister may request that the Chief Executive Officer conduct, a review of those measures if one or more of the variable factors has changed. The Minister may initiate a review at any time, however, no other interested party may apply for a review to take place earlier than 12 months since the publication of the dumping duty notice or the publication of a notice declaring the outcome of the last review of the notice.

If an application for a review of anti-dumping measures is received, and not rejected, Customs and Border Protection has up to 155 days, or such longer time as the Minister may allow, to inquire and report to the Minister on the review of the measures.

Within 110 days of the initiation, or such longer time as the Minister may allow, Customs and Border Protection must place on the public record a statement of essential facts on which it proposes to base its recommendation to the Minister concerning the review of the measures.

In making recommendations in its final report to the Minister, Customs and Border Protection must have regard to:

- the application for a review of the anti-dumping measures;
- any submission relating generally to the review of the measures to which the delegate has had regard for the purpose of formulating the statement of essential facts;
- this statement of essential facts; and
- any submission made in response to this statement of essential facts that is received by Customs and Border Protection within 20 days of being placed on the public record.

Customs and Border Protection may also have regard to any other matter that it considers to be relevant to the review.

In respect of a dumping duty notice, the delegate must provide a proposed recommendation to the Minister that the dumping duty notice¹:

- remain unaltered; or
- be revoked in its application to a particular exporter or to a particular kind of goods or revoked generally; or
- have effect in relation to a particular exporter or to exporters generally as if different variable factors had been ascertained.

¹ s. 269ZDA(1)(a) of the *Customs Act 1901* (the Act)

Following the Minister's decision, a notice will be published advising interested parties of the decision.

2.2 Notification and participation

On 21 September 2012, Customs and Border Protection received applications by Frutex Australia Pty Ltd (the applicant) for the review of anti-dumping measures that apply to processed dried currants exported to Australia from Greece by Aeghion.

Following consideration of the application the review of the measures commenced on 24 October 2012. The period of 1 October 2011 to 30 September 2012 was set as the review period.

Public notification of initiation of the review was made on 24 October 2012 in *The Australian* newspaper. Australian Customs Dumping Notice (ACDN) No. 2012/53 was also published.

Customs and Border Protection is required to place the statements of essential facts for measures relating to processed, dried currants, exported from Greece by Aeghion on the public record on or before 11 February 2013.

The final report to the Minister for processed, dried currants from Greece, which outlines Customs and Border Protection's findings and recommendations, is due on or before 28 March 2013.

2.3 Responding to the statement of essential facts

Interested parties may wish to make submissions in response to this statement of essential facts. However Customs and Border Protection is not obliged to have regard to any submissions received after **21 February 2013** if to do so would prevent the timely preparation of the report to the Minister.

Submissions should be sent to:

The Director
Trade Measures Operations 1
Australian Customs and Border Protection Service
5 Constitution Avenue
CANBERRA ACT 2601
AUSTRALIA

Submissions can also be faxed to (02) 6275 6990 or emailed to tmops1@customs.gov.au.

Interested parties intending to respond to the statement of essential facts must include a non-confidential version of their submission for placement on the public record². Submissions provided in confidence must be clearly marked "**FOR OFFICIAL USE ONLY**".

The public record contains non-confidential submissions already received from interested parties, this statement of essential facts, non-confidential versions of

² In preparing a non-confidential version interested parties should take account of the requirements set out in ACDN 2006/54.

Customs and Border Protection's visit reports and other publicly available documents such as Customs and Border Protection's initiation report, notices and other information. These documents should be read in conjunction with this statement of essential facts.

All documents on the public record are available on Customs and Border Protection's electronic public record which may be accessed on the internet at www.customs.gov.au by following the prompts for "anti-dumping".

The public record may also be viewed at Customs House Canberra by contacting International Trade Remedies Branch administration on (02) 6275 6547.

2.4 History of anti-dumping measures

Anti-dumping measures were imposed on processed dried currants from Greece on 14 January 2009 following Trade Measures Report No. 140. All exporters of processed, dried currants from Greece were subject to interim dumping duties.

After measures were imposed, the Trade Measures Review Officer (TMRO) accepted applications for a review of the decision taken by the Minister to impose measures. Following the review, the Minister accepted the recommendations of the TMRO and subsequently wrote to the Chief Executive Officer (CEO) requiring him to reinvestigate the original findings.

Following its reinvestigation, Customs and Border Protection set out its findings in Reinvestigation Report 149. The Minister accepted those findings and published a notice on 17 November 2009 reaffirming the decision to publish a dumping duty notice.

The measures have not been reviewed since they were imposed, and subsequently affirmed.

3. GOODS SUBJECT TO THE REVIEW

3.1 Preliminary findings

The Australian industry produces processed, dried currants that have characteristics closely resembling those of processed, dried currants manufactured by Aeghion in Greece and exported to Australia.

As such processed, dried currants produced by the Australian industry are like goods³.

3.2 The goods and like goods

The goods the subject of the application are processed dried currants of the grape variety *Vitis Vinifera* L. Black Corinth. Sultanas, muscat raisins, unprocessed currants or blended dried fruit mixtures are excluded from the definition of the goods.

3.2.1 Tariff classification

The goods are correctly classified to tariff subheading 0806.20.00, statistical code 29 in Schedule 3 of the *Customs Tariff Act 1995* (Cth). The rate of duty for the goods exported from Greece is 5%.

3.2.2 Like goods

The issue of like goods was considered during the original investigation in REP 140.

In REP 140, as affirmed in Reinvestigation Report 149, Customs and Border Protection was satisfied that there was an Australian industry producing like goods to the GUC.

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’.

In assessing like goods, Customs and Border Protection uses an analytical framework, which identifies different ways of examining likeness, namely physical likeness, commercial likeness, functional likeness and production likeness.

The Australian industry defined the meaning of “processed” in the context of dried currants as:

Processing of sun dried currants involves a multi-staged procedure which includes the separation of good fruit from stems, capstems, poor fruit, grit, and other foreign matter through a riddle and cone system. The fruit

³ For the purposes of s.269T.

then passes onto a belt where it is examined and unsuitable fruit or foreign matter not removed earlier is removed via hand-picking, prior to washing of the fruit and then passing to a de-watering procedure via a spinner. Finally, a light oil is sprayed onto the fruit before packing for sale.

The Australian industry further clarified the description of the goods as follows:

Dried currants are black raisins. Raisins are a dried vine fruit (i.e. predominantly seedless grapes of the variety Vitis Vinifera L.) of which there are two very distinct types (i.e. black and white raisins). Currants are black raisins that are dried under the sun and consumed predominantly as dried fruits in food and sweets or alone. Greek currants are of the variety (cultivars) Vitis Vinifera L. Black Corinth. Sub-varieties of Vitis Vinifera L. Black Corinth include Provincial, Vostizza and Gulf.

Sultanas (white raisins) are grapes of a generally light colour which are dried under the sun and consumed predominantly as dried fruits in food, alone, mixed with other dried fruit or used as food additives. Greek sultanas are of the variety (cultivars) Vitis Vinifera L. Apyrena.

The goods under consideration do not include buck currants or red currants, nor does it include berries (e.g. red berries). The goods under consideration also does not include a reference to the percentage content of currants as the Australian industry considers that once a tolerance level is included, the product could be tailored specifically to circumvent the description.

3.3 Australian Industry

3.3.1 Preliminary findings

There is an Australian industry that is producing like goods, consisting of Sunbeam Foods Pty Ltd, Sunraysia Dried Fruits Pty Ltd and Australian Premium Dried Fruits Pty Ltd⁴.

Sunbeam Foods Pty Ltd controls the significant majority of market share for the goods in Australia.

3.3.2 Manufacturing process

For goods to be taken as produced in Australia:

- they must be wholly or partly manufactured in Australia; and
- for the goods to be partly manufactured in Australia, at least one substantial process in the manufacture of the goods must be carried out in Australia⁵.

⁴ For completeness, we note that the entities which comprise the Australian industry have changed since the original investigation. Specifically, Clyne Foods Pty Ltd who was operating during the original investigation period has since ceased operation. We understand that Australian Premium Dried Fruits is a relatively new entrant to the Australian industry and has, in general terms, absorbed the market share previously held by Clyne Foods Pty Ltd.

The three entities listed above wholly comprise the total Australian industry for the production of processed, dried currants. No other interested party has claimed during this review to be an Australian producer of processed dried currants.

A verification visit was undertaken to Sunbeam during the review where the manufacturing process was confirmed and data was verified. A non-confidential version of the Sunbeam visit report will be made available on the public record.

PUBLIC RECORD

⁵ Subsections 269T(2) and 269T(3).

4. MARKET

Customs and Border Protection used information from past investigations and information collected during the review in its examination of the Australian market for processed, dried currants.

Customs and Border Protection established the market for processed, dried currants during the review period using information supplied by the Australian industry, the applicant importer, and the nominated exporter in the context of the original investigation.

Customs and Border Protection did not discover, or has been provided with, any evidence to suggest that the market for processed dried currants has changed to any significant degree since the original investigation.

We understand that processed dried currants are sold to three market segments in Australia, namely:

- retail;
- food service; and
- industrial food processing.

These market segments can be differentiated by the package size sold in the respective markets. Specifically;

- the retail market generally purchases the goods in 300 gram and 1 kilogram (KG) pack sizes; and
- the food service and industrial food processor sectors generally purchase processed dried currants in larger, 10KG and 12.5KG pack sizes.

The food services and industrial food processor market segments could, for the purposes of anti-dumping enquiries, be categorised as one market segment (namely the 'industrial food' segment).

4.1 Retail segment

The retail segment is driven by demand from consumers using processed dried currants as an additive for foods. Typical customers include large supermarket chains and fresh produce and health stores.

We understand that domestically produced processed, dried currants do not compete with imported product in any significant degree with respect to the retail segment of the Australian market.

4.2 Industrial food segment

The food service sector includes the hospitality and smaller distributors for processed dried currants. The industrial food processor segment of the market includes the larger, bulk buyers that use processed dried currants as ingredients in further value-add manufacturing such as bakeries, biscuit, cake and cereal manufacturers.

As mentioned above, this segment is characterised by sales of processed, dried currants in large 'bulk' quantities of 10kg and 12.5kg packs. We understand

that domestically produced product competes directly with imported product in relation to sales into the industrial food segment.

Further, we understand that sales into this segment are largely made on the basis of long-term supply contracts and there is significant competition for the securement of contracts between domestic producers and importers, food brokers and traders who source imported processed, dried currants.

PUBLIC RECORD

5. EXPORT PRICE AND NORMAL VALUE

5.1 Preliminary findings

- The export price for processed, dried currants exported to Australia by Aeghion can be determined from the prices paid, or payable, by the Australian importer⁶.
- The normal value for processed, dried currants exported by Aeghion can be determined using data provided by the subject exporter in Greece pertaining to the price paid or payable for like goods sold in sales that are arm's length transactions, in the ordinary course of trade, for home consumption in the Greece⁷;

5.3 The applicant's claims

Frutex (the applicant) claims that one or more of the variable factors relevant to the taking of anti-dumping measures with respect to processed, dried currants have changed⁸.

Specifically, the applicant asserts that the export price, normal value and the non-injurious price have changed since the imposition of measures.

5.4 The nominated exporter

An exporter questionnaire was sent to Aeghion requesting a response with respect to its exports of processed dried currants to Australia during the period of review. Aeghion provided a completed response to the questionnaire. A non-confidential copy of Aeghion's response is available on the public record.

5.4.1 Export price

General

On the basis of export sales material provided by Aeghion, and associated import transaction data provided by the applicant, we have determined that Aeghion directly exported the goods to Australia during the period of review and retained responsibility for all activities associated with the sale and exportation of the goods from Greece to Australia and retained beneficial ownership of the goods at all stages of the exportation process up until FOB point. On this basis Customs and Border Protection is satisfied that Aeghion is appropriately characterised as the exporter of the goods for the purposes of the review of measures.

Further, in consideration of the available verified evidence with respect to Aeghion's exports of the goods to Australia during the relevant period, Customs and Border Protection have determined that the applicant is directly responsible

⁶ In accordance with subsection 269TAB(1)(a)

⁷ In accordance with subsection 269TAC(1)

⁸ In accordance with subsection 269ZC(2)

for all activities associated with the negotiation and procurement of the goods from Aeghion and, inter alia, is responsible for all activities and costs associated with the importation of the goods into Australia from FOB point to their facilities in Australia. On this basis Customs and Border Protection is satisfied that the applicant is appropriately characterised as the importer with respect to all exports of the goods to Australia made by Aeghion during the review period.

For completeness, we note that all export transactions between the Aeghion and the applicant were of Greek Vostizza Currants of the same designated quality and grade, sourced from either 2011 or 2012 growing seasons, packed in 12.5kg cartons.

On the basis of all available commercial information related to sales of the goods between Aeghion and the applicant, and all available information regarding the commercial arrangements between the two entities during the period of review, we were satisfied that all transactions between Aeghion and the applicant were made at arm's-length.

Export price determinations

The export price for the goods exported by Aeghion has been determined under s.269TAB(1)(a) being the price paid or payable by the importer other than any part of that price which represents a charge in respect of the transportation of the goods after exportation or in respect of any other matter arising after exportation.

Export prices have been calculated for each export transaction using the price between Aeghion and the importer, Frutex. The individual transactions have been used to determine a weighted average export price for all shipments exported during the investigation period.

5.4.2 Normal value

Original investigation

In the original investigation, Customs and Border Protection considered that sufficient information had not been furnished to enable normal values to be established in terms of:

- subsection 269TAC(1)⁹;
- subsection 269TAC(2)(c)¹⁰; or
- subsection 269TAC(2)(d)¹¹

Accordingly, normal values for the purposes of the original investigation period were determined pursuant to subsection 269TAC(6) having regard to all relevant information.

⁹ using the price paid or payable in the domestic market for sales by the exporters or other sellers of currants in Greece;

¹⁰ using the sum of the cost of production of the goods in Greece, and (on the assumption that the goods were sold domestically in Greece rather than exported) the administrative, selling and general costs, and the profit, on that sale;

¹¹ using the price paid or payable for like goods sold from Greece to a third country.

On this basis normal values for the sales of like goods in Greece were constructed by Customs and Border Protection having regard, inter alia, to:

- domestic sales data for currants, as submitted by an exporter and producer of currants, namely, Aeghion, and by another producer; and
- submissions provided by Australian industry regarding the calculation of normal value.

Determination of normal value for the purposes of the review

Customs and Border Protection provided the nominated subject exporter, Aeghion, with an exporter questionnaire for the purposes of acquiring data to enable the determination of contemporary normal values with respect to sales of like goods within the domestic market in Greece.

Aeghion provided a completed questionnaire to Customs and Border Protection along with all associated supporting documentation and data pertaining to its export sales to Australia and sales of like goods to customers within the domestic market in Greece, and third countries within the European Union.

Customs and Border Protection considers the response provided to be sufficiently complete in both form and substance to deem Aeghion to have satisfied its obligations as a co-operative exporter.

Thorough consideration was also given to the reliability of the questionnaire in undertaking an assessment as to whether it was necessary for Customs and Border Protection to visit Aeghion for the purposes of verification of the data supplied.

Customs and Border Protection was satisfied that the commercial sales data provided was relevantly complete and accurate to enable a desk-based verification to be undertaken for the purposes of establishing normal value with respect to the goods.

Additionally, Customs and Border Protection was cognisant of key circumstances of the investigation including, but not limited to, determinations that had been made relating to the contemporary non-injurious price (NIP) (see section 6) which provided sufficiently robust indication that the NIP would be the operative measure in relation to the review of measures.

In summary, having regard to all the circumstances of the investigation, Customs and Border Protection was satisfied that a verification visit was not warranted in this instance.

On the basis of the above, Customs and Border Protection considers that the material provided by Aeghion is sufficient to determine normal values for processed dried currants sold in the domestic market in Greece pursuant to s.269TAC(1), being the price paid or payable for like goods sold in the ordinary course of trade for home consumption in Greece in sales that are arms-length transactions by Aeghion.

Customs and Border Protection has used the domestic selling prices for Corinthian Vostizza Currants sold in Greece in 12.5kg packs sizes on the basis that Customs and Border Protection is satisfied, on the basis of the available information, that these goods are identical to the goods exported to Australia.

Selling prices, as reflected in the commercial data provided by Aeghion, have been adjusted for domestic credit terms, export inland freight and FOB related expenses, for the purposes of determining normal values on a cash FOB basis.

Caveat to the determination of normal values

As a caveat to the above, Customs and Border Protection notes that there are inherent limitations in respect to the depth of the assessment and analysis of the commercial material provided by Aeghion undertaken for the purposes of determining normal values.

As discussed above, Customs and Border Protection's assessment of contemporary value of the key variable factors subject to the review ascertained that the NIP would be the operative measure.

On the basis of this preliminary assessment, Customs and Border Protection does not consider it necessary to examine whether payments received by Greek growers of currants under the Common Agricultural Policy implemented by the European Union have resulted in distorted production costs or have created, or contributed to, a situation in the Greek domestic market that renders domestic sales unsuitable for the purposes of determining normal value of the subject goods.

Customs and Border Protection notes that further analysis of the Greek domestic market for the goods may be undertaken in the event that an interested party can furnish sufficient evidence to suggest that factors exist which would render domestic sales unsuitable for the purposes of determining normal values.

5.4.3 Dumping margin

Measurement of a dumping margin is not required for the purposes of revising the variable factors. However a dumping margin has been calculated for processed dried currants exported by Aeghion over the review period based upon a comparison of normal values and corresponding export price. The dumping margin calculated for Aeghion was 4.2%.

6. NON-INJURIOUS PRICE

6.1 Preliminary findings

The NIP can be established for processed dried currants by using the selling prices of the Australian industry during the review period¹², with appropriate adjustments made to take account of post-exportation expenses and duty payable by the applicant in relation to the importation of the goods during the period of review.

6.2 Introduction

Dumping duties may be applied where it is established that dumped imports have caused or threaten to cause injury to the Australian industry producing like goods. The level of dumping duty cannot exceed the margin of dumping, but a lesser duty may be applied if it is sufficient to remove the injury.

The calculation of the NIP provides the mechanism whereby this lesser duty provision is given effect. The NIP is the minimum price necessary to prevent the injury, or a recurrence of the injury, caused to the Australian industry by the dumping¹³.

Anti-dumping duties are usually based on FOB prices in the country of export. Therefore a non-injurious price is calculated in FOB terms for the country of export.

6.3 Methods of calculating non-injurious price

The method of calculating a non-injurious price is not given in the legislation, but it is generally derived from Australian industry's unsuppressed selling price. The unsuppressed selling price is a price at which the Australian industry might reasonably be able to sell the goods in a market unaffected by dumped imports.

Customs and Border Protection's preferred approach to establishing the unsuppressed selling price observes the following hierarchy:

1. Industry selling prices at a time unaffected by dumping (known as an unsuppressed selling price).
2. Constructed industry prices – industry cost to make and sell plus an appropriate profit.
3. Selling prices of un-dumped imports.

Having calculated the unsuppressed selling price, Customs and Border Protection then calculates a NIP by deducting the costs incurred in getting the goods from the export FOB point (or another point if appropriate) to the relevant level of trade in Australia.

¹³ The non-injurious price is defined in s.269TACA.

In the original investigation the unsuppressed selling price for processed, dried currants was determined using the second methodology set out above – that is, using Sunbeam’s cost to make and sell plus a rate of profit achieved with respect to sales of all products.

As referred to above at 6.1, Customs and Border Protection believes selling prices during this period can reasonably be deemed to reflect prices achieved in relation to the subject goods at a time unaffected by dumping, by virtue of the measures currently in force. On this basis, for the purposes of the present review of measures, Customs and Border Protection believes that verified selling prices achieved by the Australian industry during the review period can be seen to reflect an unsuppressed selling price for the purposes of calculating the NIP.

6.4 Australian industry’s view

Sunbeam have not made any submissions, or provided any comment, regarding the methodology for the determination of a contemporary unsuppressed selling price for processed, dried currants for the purposes of the review.

6.5 Customs and Border Protection’s assessment

In the course of its investigations, Customs and Border Protection has considered the hierarchy mentioned above at 6.3 with respect to the determination of the NIP.

Customs and Border Protection is satisfied that, due to the current imposition of anti-dumping measures with respect to the subject goods, Australian industry selling prices reflected in information provided and verified with Sunbeam, have not been affected by dumping during the review period.

As explained in greater detail above, Customs and Border Protection has established that the imported goods are sold into the Australian industrial food services sector. We found no indication that would suggest that any of the goods imported by the applicant were sold into the retail sector of the Australian market.

Accordingly Customs and Border Protection considers that Australian industry selling prices of processed, dried currants sold into the industrial food segment are suitable as the basis for a determination of a weighted average USP for the purposes of the review on the basis that these sales compete directly with the imported goods.

To determine the non-injurious price at the FOB level, deductions have been made from the unsuppressed selling price for:

- overseas freight and marine insurance;
- Australian landing and port charges;
- Customs and quarantine clearances;
- delivery charges from the port to the warehouse and to the customer; and

- sales and administration expenses and profit.

PUBLIC RECORD

7. EFFECT OF THE REVIEW

As a result of this variable factor review, Customs and Border Protection has found that, when contemporary variable factors are compared to the corresponding value determined in the context of the original investigation;

- a) export prices have increased;
- b) normal values have increased¹⁴; and
- c) the NIP has also increased.

On the basis of our analysis of contemporary variable factors, the NIP is the operative measure¹⁵ for processed dried currants exported by Aeghion.

On the basis of determined export prices for the review period, which were found to be greater than the ascertained NIP, Customs and Border Protection intends recommending that measures reflect a floor price equal to the ascertained NIP. Based on the floor price mechanism, interim dumping duty will only be payable where actual export prices are below the floor price.

¹⁴ As a caveat to the this statement, Customs and Border Protection notes that, as explained in greater detail above, normal values have been determined for the purposes of our analysis using information provided by the subject exporter, whereas normal values in the original investigation were constructed using Australian industry data.

As such, in considering the relative difference between normal values of the original investigation and contemporary normal values, we have given due consideration to the significant differences between the respective methodologies applied.

¹⁵ The operative measure is the lesser of the normal value or non-injurious price. The difference between the revised operative measures and the revised export prices provide for the fixed component of interim dumping duty per unit.