INVESTIGATION 316

ALLEGED DUMPING AND SUBSIDISATION OF
GRINDING BALLS
EXPORTED FROM THE PEOPLE’S REPUBLIC OF CHINA

VERIFICATION REPORT - EXPORTER

CHANGSHU LONGTE GRINDING BALL CO., 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 THE ANTI-DUMPING COMMISSION

March 2016
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1 BACKGROUND

On 17 November 2015, the Commissioner of the Anti-Dumping Commission (the Commissioner) gave public notice of his decision to initiate an anti-dumping investigation in respect of grinding balls exported to Australia from the People’s Republic of China (China). Anti-Dumping Notice (ADN) No. 2015/132 provides further information on the investigation and is available on the Anti-Dumping Commission’s (the Commission’s) electronic public record (EPR).

The background relating to the initiation of this investigation is contained in Consideration Report 316.

Following this initiation, the Commission wrote to Changshu Longte Grinding Ball Co., Ltd (Longte) inviting it to cooperate with the investigation. Longte cooperated through submitting a completed exporter questionnaire response (EQR) and relevant attachments.
## THE GOODS AND LIKE GOODS

### 2.1 The goods exported to Australia

The table below summarises the models of grinding balls exported to Australia that were manufactured by Longte.

<table>
<thead>
<tr>
<th>Model</th>
<th>Function / end use</th>
<th>Chemical composition</th>
<th>Production method</th>
</tr>
</thead>
</table>
| LTB2    | Used for the comminution of metalliferous ores. | According to Longte’s product brochure:  
C: 0.72-1.03  
Si: 0.15-0.35  
Mn: 0.30-1.20  
Cr: 0.2-0.80  
P: ≤0.035  
S≤0.035  
Ni≤0.25  
Cu≤0.25 | Generally speaking, grinding balls up to a diameter of 80mm are manufactured through a rolled formed (casting) process. An upset (forging) process is generally used for balls exceeding 80 mm in diameter. However, within a certain range of 80 mm, balls can be manufactured by either method, depending on customer preferences (if any) |
| LTB3    | As above.                              | According to Longte’s product brochure:  
C: 0.53-0.88  
Si: 1.2-2.00  
Mn: 0.50-1.20  
Cr: 0.4-1.20  
P≤0.035  
S≤0.035  
Ni≤0.25  
Cu≤0.25 | As above |
| LTB3-2  | As above.                              | Provided, but not publically available information                                  | As above |
| LTB4    | As above.                              | Provided, but not publically available information                                  | As above |

Longte advised that the LTB designated models were the company’s proprietary products and that the LTBU models were models produced pursuant to a joint venture arrangement.

Longte advised that grinding balls were produced based on orders received. However, on some occasions more stock will be produced than that order which would be subsequently sold. Overall, an inventory of grinding balls was not maintained.
2.2 Like goods sold on the domestic market

Longte submitted in its EQR that grinding balls sold on the domestic market of the same diameter as the grinding balls exported to Australia were considered to be “like goods”.

A summary of the characteristics of domestically-sold models of grinding balls and an analysis of whether there are any exported models that are comparable to these domestic goods, is shown in the below table.

<table>
<thead>
<tr>
<th>Domestic model</th>
<th>Commercial and functional properties</th>
<th>Physical properties</th>
<th>Production</th>
<th>AU model match?</th>
</tr>
</thead>
<tbody>
<tr>
<td>LTB2</td>
<td>Sizes 30-80 mm            Used for the comminution of metalliferous ores.</td>
<td>Same as the LTB2 models sold in Australia where the diameter is the same.</td>
<td>Same as the LTB2 models sold in Australia where the diameter is the same.</td>
<td>Yes, where the model and the diameter are the same.</td>
</tr>
<tr>
<td>LTB3</td>
<td>Sizes 90 – 125 mm         Used for the comminution of metalliferous ores.</td>
<td>Same as the LTB3 models sold in Australia where the diameter is the same.</td>
<td>Same as the LTB3 models sold in Australia where the diameter is the same.</td>
<td>Yes, where the model and the diameter are the same.</td>
</tr>
</tbody>
</table>

2.3 Model matching

The verification team considers that Longte sells like goods on the domestic market to the goods exported to Australia. Additionally, the verification team notes that Longte sells grinding ball with similar grades of steel and diameters in the domestic market as it exports to Australia. However, the verification team notes that not all models exported to Australia were sold domestically and that there are potentially critical differences between some of the models exported to Australia and those models sold domestically.

However, as Commonwealth Steel Company Pty Ltd (trading as Moly-Cop) (Moly-Cop) and Donhad Pty Ltd (Donhad) has made claims that a particular market situation exists in the Chinese domestic grinding ball marketplace, without pre-empting the Commissioner’s decision on market situation, the verification team has determined normal values under 269TAC(2)(c) which does not require matching domestic models to export models of grinding balls.

2.4 Like goods – preliminary assessment

The verification team considers that grinding balls produced and sold domestically by Longte have characteristics closely resembling those of the goods exported to Australia and are “like goods” in terms of section 269T(1) of the Customs Act 1901\(^1\).

\(^1\) References to any section or subsection of legislation are references to the Customs Act 1901 unless otherwise specified.
3 VERIFICATION OF EXPORT SALES TO AUSTRALIA

3.1 Revised export sales spreadsheet

At the start of the verification, Longte provided a revised export sales spreadsheet. It added further details in relation to its export sales via ME Longteng Grinding Media (Changshu) Co., Ltd. (ME Longteng), a joint venture company. Specifically, it included the customer name, shipping terms, gross invoice value and export expenses relating to the transaction between ME Longteng and the Australian customer.

Longteng also revised bank charges after discovering an error while preparing for the verification visit.

3.2 Verification of sales to audited financial statements

The verification team verified the completeness and relevance of Longte export sales spreadsheet by reconciling it to audited financial accounts in accordance with ADN 2016/30.

Details of the verification are contained within the verification work program at Confidential Attachment 1.

3.2.1 20mm grinding balls

Longte included export sales of 20mm grinding balls in its export sales spreadsheet. As the goods are grinding balls between 22mm and 170mm inclusive, the verification team excluded export sales of 20mm grinding balls from the export sales spreadsheet.

3.2.2 Transaction outside the investigation period

Longte included one export transaction that was invoiced outside the investigation period. Therefore, the verification team excluded that transaction from the export sales spreadsheet.

3.3 Verification of export sales to source documents

The verification team verified the accuracy of Longte’s export sales spreadsheet by reconciling it to source documents in accordance with ADN 2016/30.

Details of the verification are contained within the verification work program at Confidential Attachment 1.

3.3.1 Bank charges

As flagged in section 3.1 above, there were errors in the export sales spreadsheet submitted in the exporter questionnaire response. After providing the revised spreadsheet, the verification team was able to reconcile the bank charges to the source documents.
3.3.2 Credit terms

Longteng calculated credit terms based on the number of days between the actual invoice date and payment date. During the verification visit, a calculation error was discovered for one selected transaction, which was rectified in the export sales spreadsheet.

3.4 Treatment of Longte, Changshu Longteng Special Steel Co., Ltd and ME Longteng as a single entity

The verification team considered the circumstances of the supply of grinding bar from Longte’s parent company, Changshu Longteng Special Steel Co., Ltd. (Longteng) and considered the appropriateness of collapsing Longte and Longteng into a single entity.

In addition, the verification team also considered the circumstances of the manufacture and export of grinding balls through a joint venture arrangement and considered the appropriateness of collapsing Longte and ME Longteng into a single entity.

Where entities are ‘collapsed’ the actions of one member of the entity are taken to represent the actions of the whole. The issue of considering multiple entities as a single entity for the purpose of calculating dumping margins was considered by a World Trade Organization (WTO) dispute settlement panel dealing with the case of Korea – Anti-Dumping Duties on Imports of Certain Paper from Indonesia.2

In that WTO dispute settlement panel, the panel stated:

“In our view, in order to properly treat multiple companies as a single exporter or producer in the context of its dumping determinations in an investigation, the investigating authority has to determine that these companies are in a relationship close enough to support that treatment.”

It also stated that entities could be treated as a single entity where:

“the structural and commercial relationship between the companies in question is sufficiently close to be considered as a single exporter or producer.”

The panel considered that common management and ownership are indications of a close legal and commercial relationship and such companies “could harmonize their commercial activities to fulfill common corporate objectives.”

In this instance evidence of this capacity to harmonize commercial activities include:

- Longteng has a controlling interest in Longte.
- Longteng is the equal joint venture partner in ME Longteng.
- During the verification, information and data was provided by Longte on behalf of Longteng and ME Longteng.
- Other collaborative production arrangements between Longte and ME Longteng.

Considering the close structural and commercial relationship between Longte, Longteng and ME Longteng, the verification team considers it is appropriate to treat these companies as a single entity for the purpose of calculating a dumping margin.

2 WT/DS312/R.
3.5 The exporter

For all export sales during the investigation period, the verification team considers Longte, Longteng and ME Longteng, as a collapsed entity, to be the exporter\(^3\) of the goods.

3.6 The importer

The verification team considers that, in relation to the goods exported by Longte, Longteng and ME Longteng as a collapsed entity during the investigation period, the customers listed in the Australian sales listing were the beneficial owners of the goods at the time of importation and therefore were the importers of the goods.

3.7 Related parties customers

The verification team did not identify any Australian customers which were related to Longte.

3.8 Arms length

In respect of export sales of grinding bar to Australia by Longte, Longteng and ME Longteng as a collapsed entity during the investigation period, the verification team found no evidence that:

- there is any consideration payable for or in respect of the goods other than their price; or
- 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; or
- the buyer, or an associate of the buyer, will directly or indirectly, be reimbursed, compensated or otherwise receive a benefit for, or in respect of, whole or any part of the price.

The verification team therefore consider that all grinding ball export sales to Australia by Longte, Longteng and ME Longteng as a collapsed entity during the investigation period were arms length\(^4\) transactions.

3.9 Export price – preliminary assessment

The verification team is satisfied that the export sales data is complete, relevant and accurate.

\(^3\) The Commission generally identifies 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 a principal in the transaction, located in the country of export, who owns, or previously owned, the goods but need not be the owner at the time the goods were shipped.

\(^4\) Section 269TAA of the Act outlines the circumstances in which the price paid or payable shall not be treated as being at arms length. These are where: there is any consideration payable for or 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; or in the opinion of the Parliamentary Secretary, 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.
In relation to the goods exported by Longte, Longteng and ME Longteng as a collapsed entity, the verification team recommends that export price be determined under section 269TAB(1)(a) of the Act, as the price paid by the importer less transport and other costs arising after exportation.

The team’s preliminary export price calculations are at **Confidential Appendix 1**.
4 COST TO MAKE AND SELL

4.1 Verification of Longte’s costs up to audited financial statements

The verification team verified the completeness and relevance of Longte’s cost to make and sale (CTMS) spreadsheet by reconciling it to audited financial accounts in accordance with ADN 2016/30.

Details of the verification are contained within the verification work program at Confidential Attachment 1.

The verification team did not identify any issues during the upwards verification of CTMS.

4.2 Verification of costs down to source documents

The verification team verified the accuracy of Longte’s cost to make and sale spreadsheet by reconciling it to source documents in accordance with ADN 2016/30.

Details of the verification are contained within the verification work program at Confidential Attachment 1.

4.2.1 Blast furnace gas

Longte’s cost to make included costs for blast furnace gas supplied by Longteng. As the verification team considers it appropriate to collapse Longte and Longteng into a single entity (see section 3.4 above), it follows that the cost of blast furnace gas supplied by Longteng should be excluded. The verification team was able to verify that blast furnace gas revenue was not included as a cost offset for steel bar supplied by Longteng.

4.2.2 Selling, general and administrative expenses

Longte advised that its export costs included inland transport and port charges relating to export sales. The verification team noted that inland transport costs were included in in the original selling, general & administrative expenses (SG&A) calculations provided.

Longte allocated SG&A as a percentage of revenue, however, the revenue amount included other business income that is unrelated to the normal business operation of Longte.

Accordingly, Longte provided a revised SG&A, which excluded inland transport costs and other business income from the calculation.

4.2.3 Longteng’s SG&A

As discussed in section 3.4 above, the verification team considered it appropriate to collapse Longte and Longteng into a single entity. Accordingly, the verification team allocated Longteng’s general and administrative as a percentage of revenue to the CTMS. The verification team did not allocate Longteng’s selling expenses as these expenses are not relevant to the sales of grinding balls.
4.2.4 ME Longteng’s SG&A

As discussed in section 3.4 above, the verification team considered it appropriate to collapse Longte and ME Longteng’s into a single entity. The verification team verified that Longteng’s SG&A, as a percentage of revenue to the CTMS of grinding balls exported through ME Longteng only, had been fully absorbed in the costing data provided.

Longte advised that it may seek to make further submissions to the case management team in relation to the treatment of the cost data used by the verification team in relation to ME Longteng.

4.3 Cost to make and sell – summary

Having verified Longte’s CTMS data for grinding ball to audited financial accounts and to source documents, the verification team is satisfied that Longte’s CTMS data is complete, relevant and accurate.

Longte’s verified CTMS spreadsheet is at Confidential Appendix 2.
5  VERIFICATION OF DOMESTIC SALES

5.1 Verification of domestic sales to audited financial statements

The verification team verified the completeness and relevance of Longte’s domestic sales spreadsheet by reconciling it to audited financial accounts in accordance with ADN 2016/30.

Details of the verification are contained within the verification work program at Confidential Attachment 1.

The upwards verification of domestic sales was done in conjunction with export sales and the verification team did not identify any issues.

5.1.1 Sales to a domestic trader

The verification team noted that the source documents to one domestic customer indicated that it was destined to third countries. Longte confirmed that all sales to that customer were destined to third countries. During the visit, the verification team selected a further three sales to that customer and Longte provided documentation showing the destination of these sales as third country sales. Accordingly, the verification team excluded sales to that customer from the domestic sales spreadsheet.

5.2 Verification of domestic sales to source documents

The verification team verified the accuracy of Longte’s export sales spreadsheet by reconciling it to source documents in accordance with ADN 2016/30.

Details of the verification are contained within the verification work program at Confidential Attachment 1.

The verification team did not identify any issues during the downwards verification of domestic sales.

5.3 Related parties customers

The verification team did not identify any domestic customers which were related to Longte.

5.4 Arms length

In respect of Longte’s domestic sales of grinding ball during the investigation period, the verification team found no evidence that:

- there is any consideration payable for or in respect of grinding ball other than their price; or
- 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; or
- the buyer, or an associate of the buyer, will directly or indirectly, be reimbursed, compensated or otherwise receive a benefit for, or in respect of, the whole or any part of the price.
The verification team therefore considers that all domestic sales by Longte during the investigation period were arms length transactions.

5.5 Ordinary course of trade

Section 269TAAD of the Act provides that if like goods are sold in the country of export at a price less than the cost of such goods and are unrecoverable within a reasonable period, they are taken not to have been paid in the ordinary course of trade (OCOT).

The verification team compared the quarterly domestic CTMS to the corresponding net invoice price to test whether domestic sales were profitable. Where the volume of unprofitable sales exceeded 20 per cent for the product category, the team then tested the recoverability of the unprofitable sales by comparing the unit selling price to the corresponding weighted average CTMS over the whole of the investigation period. Those sales found to be unrecoverable were deemed not to be made in the OCOT.

5.6 Suitability of sales and profit

As discussed in section 2.3 above, normal values have been constructed using the costs to make the exported goods, plus SG&A applicable to the goods sold domestically, and an additional amount for profit.

The profitability of domestic sales of like goods has been calculated by comparing the selling price with the corresponding quarterly CTMS. In calculating the profit, the verification team has only included domestic sales made in the OCOT5.

5.7 Domestic sales – conclusion

The verification team has determined normal values under 269TAC(2)(c) using the cost to make and sell and an amount for profit.

Notwithstanding this treatment, this chapter sets out the verification conducted in relation to selling prices and the results of the OCOT test that was used to determine an appropriate amount of profit.

Domestic sales spreadsheet is at Confidential Appendix 3.

5 Section 45(2) of the Customs (International Obligations) Regulation 2015
6 ADJUSTMENTS

To ensure that the normal value was comparable to the Australian export price at FOB terms, the following adjustments were made.

6.1 Export inland freight, handling and port charges

The verification team considers an upward adjustment to normal values for export inland freight, handling and port charges is required to ensure a fair comparison to the export price. The verification team applied an upwards adjustment based on actual export inland freight, handling and port charges listed for each export transaction.

6.2 Bank charges

The verification team considers an upward adjustment to normal values based on the export bank charges is necessary to ensure a fair comparison to the export price. The verification team applied an upwards adjustment, where applicable, based on actual bank charges listed for each export transaction.

6.3 Non-refundable value-added tax

Longte incurs a non-refundable VAT expense on export sales to Australia of 12% for grinding bar, being the difference between the VAT rate of 17% less a 5% VAT rebate on export sales of grinding balls. Therefore, the verification team applied an upward adjustment of 12% to the normal value.

6.4 Export credit terms

The verification team considers an upward adjustment to normal values for export credit terms is necessary to ensure a fair comparison to the export price. The verification team applied an upwards adjustment based on the actual credit days listed for each export transaction and Longte’s weighted average interest rate on short term borrowings over the period of the investigation.

6.5 Adjustments – conclusion

The verification team is satisfied that there is sufficient and reliable information to justify the following adjustments, in accordance with section 269TAC(9) of the Act, and considers these adjustments are necessary to ensure a fair comparison of normal values and export prices:

<table>
<thead>
<tr>
<th>Adjustment Type</th>
<th>Deduction/addition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Export inland freight, handling and port charges</td>
<td><strong>Add</strong> cost of export inland freight, handling and port charges</td>
</tr>
<tr>
<td>Export bank charges</td>
<td><strong>Add</strong> cost of bank charges</td>
</tr>
<tr>
<td>Non-refundable VAT</td>
<td><strong>Add</strong> an amount for the non-refundable VAT</td>
</tr>
<tr>
<td>Export Credit terms</td>
<td><strong>Add</strong> an amount for the cost of export credit terms</td>
</tr>
</tbody>
</table>

Grinding Bar – Changshu Longte Grinding Ball Co., Ltd – Exporter Verification Report
7  NORMAL VALUE

As stated in section 2.3 above, in its application, Moly-Cop and Donhad claimed that a particular market situation exists in the Chinese domestic grinding ball marketplace.

Accordingly, without pre-empting the Commissioner’s decision on market situation, Longte’s normal values have been constructed under 269TAC(2)(c) using Longte’s actual cost to make grinding ball exported to Australia plus SG&A on the assumption that the goods, instead of being exported, were sold domestically. A rate of profit, as discussed in section 5.6 above, has been added using its domestic sales of like goods made in the ordinary course of trade6.

In using costs to make and sell as the basis for normal values, the verification team considers that certain adjustments, in accordance with section 269TAC(9), are necessary to ensure fair comparison of normal values with export prices as outlined in chapter 6 above.

The normal value calculations are at Confidential Appendix 4.

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6 Section 45 of the Customs (International Obligations) Regulation 2015.
The dumping margin has been assessed by comparing the weighted average export prices to the corresponding weighted average normal values for the investigation period\textsuperscript{7}. The dumping margin in respect of grinding ball exported to Australia by Longte for the investigation period is -5.9 per cent. The preliminary dumping margin calculation is at Confidential Appendix 5.

\textsuperscript{7} In accordance with section TACB(2)(a)
9 SUBSIDIES

9.1 Grants

The verification team verified the completeness of the grants list declared in the exporter questionnaire by reconciling the amounts to the non-operating income ledger over the investigation period for Longte, Longteng and ME Longteng.

The verification team verified the accuracy of the grants by reconciling the source documents, including proof of payment, submitted in the exporter questionnaire response.

9.2 Tax benefit

The verification team verified the tax benefit declared by Longte to the annual tax returns submitted in the exporter questionnaire response. During the visit, the annual tax returns for Longteng and ME Longteng was also provided.

9.3 Preferential loans

The verification team verified the completeness of the loans declared in the supplementary exporter questionnaire by reconciling it to Longte’s short-term borrowing ledger.

The verification team verified the accuracy of the loans by making a selection of loans and reconciling the details to source documents.
# 10 APPENDICES AND ATTACHMENTS

<table>
<thead>
<tr>
<th>Confidential Appendix 1</th>
<th>Export sales</th>
</tr>
</thead>
<tbody>
<tr>
<td>Confidential Appendix 2</td>
<td>Cost to make and sell</td>
</tr>
<tr>
<td>Confidential Appendix 3</td>
<td>Domestic sales</td>
</tr>
<tr>
<td>Confidential Appendix 4</td>
<td>Normal value</td>
</tr>
<tr>
<td>Confidential Appendix 5</td>
<td>Dumping margin</td>
</tr>
<tr>
<td>Confidential Attachment 1</td>
<td>Verification work program</td>
</tr>
</tbody>
</table>