



Australian Government
Department of Industry,
Science and Resources

Anti-Dumping
Commission

Exporter verification report

Verification and case details

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Case type	Review of Measures		
Exporter	Goomax Metal Co Ltd		
Location	Virtual verification		
Verification date	4/01/2023	to	13/01/2023
Review period	1/07/2021	to	30/06/2022

The Anti-Dumping Commission will review this report, including its views and recommendations.

This report may not reflect the Anti-Dumping Commission's final position.

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Introduction

Goomax Metal Co. Ltd (Goomax) submitted data to the Anti-Dumping Commission (the commission) in response to an exporter questionnaire for Review of Measures 609 (case 609) into Aluminium Extrusions from People's Republic of China (China).

A verification team (the team) has verified whether the data Goomax submitted is complete, relevant and accurate for use in case 609. [Anti-Dumping Notice \(ADN\) 2016/30](#) describes the commission's verification procedure.

This report explains the team's key findings, including the evidence considered and material issues identified. Where Goomax or the team materially revised the submitted data, this report outlines the nature, extent and outcomes of these revisions.

The commission prepared this report to publish on the electronic public record for case 609.

Verification teams are authorised to conduct verifications under sections 269SMG and 269SMR of the *Customs Act 1901 (Cth)* (the Act).¹

¹ All legal citations in this report are to the Act unless otherwise stated.

1 Company background

1.1 Corporate structure and ownership

Goomax Metal Co. Ltd (Goomax), founded in 1995, is a Fujian province based Chinese manufacturer and seller of aluminium extrusion. In addition to the aluminium extrusion, the company also manufactures other non-goods under consideration (GUC) products such as stainless steel products.

Goomax is a privately owned company with number of related group companies involved in the production and processing of aluminium and other metal products. The other related entities are either partly or fully owned by the owners/directors of Goomax. The company changed its name to the one stated above from 'Goomax Metal Co. Ltd, Fujian' in 2022.

Goomax is 100% owned by two private individuals, residents of China.

Goomax did not have any related party customer or supplier of raw materials related to the production of aluminium extrusion during the review period.

1.2 Related parties

The team found no related party customers or suppliers involved in Goomax producing or selling the goods during the review period.

1.3 Accounting records

Goomax' accounts are not audited. The company advised that it is not required by regulation to audit its financial statement as it is a private company.

However, Goomax provided certification from external accountants certifying that its accounts are prepared as per the China's GAAP.

Therefore, the team considers that the accounting records held by the company comply with the generally accepted accounting principles of China.

2 Goods under consideration and like goods

2.1 Production process

Goomax’s production process involves taking different kinds of primary aluminium metal and passing through number of steps or processing to derive the aluminium extrusion profiles as specified by customers.

Production Process Flowchart

I. Aluminum profile production flow chart



Figure 1: Aluminium extrusion production process

As Figure 1 indicates, the primary aluminium materials of different kinds, are melted to convert them into aluminium rods. Goomax also buys a significant portion of its aluminium requirement in the form of aluminium rods. These rods are heated and extruded through the dies to derive desired aluminium profiles.

The extruded profiles, which are also called mill finish, are either sold to customers or are sent for further surface treatment as specified by the customers. The key stages of entire production process and the respective workshops are:

- **Melting shop:** In this workshop, Goomax converts the purchased aluminium ingots and scraps, both purchased as well as internally generated, into aluminium rods.
- **Extrusion shop:** The self-produced aluminium rods and the purchased rods are extruded through specific dies using hydraulic press while simultaneously being heat treated. The extruded profiles are sent for finishing or further treatments.
 - **Mill finish** – is the final product that comes out of this stage of production.
- **Anodising and Electrophoresis workshop:** The mill finish profiles are sent to anodising and electrophoresis workshop where the mill finish profiles are processed and given oxidation treatment to arrive at ‘anodised’ finish surface. Similarly, to derive electrophoresis finish profiles, the anodised profiles are passed through electrophoresis systems and a curing mechanism.
 - **Anodised and Electrophoresis finish** are the final product of this stage of production
- **Powder coating workshop:** The mill finish profiles from the extrusion workshop are processed through powder coating workshop that employ electrostatic coating system to coat the profiles with the desired finish.
- **Woodgrain workshop:** The powder coated finish profiles are taken and further processed using a process called sublimation to imprint images of wood grain is embedded into powder coated profiles.

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The verification team found that goods destined for domestic and export customers are packaged the same manner.

2.2 Model control codes

The sales and costs data Goomax submitted complies with the model control code (MCC) structure detailed in ADN 2022/81.

2.2.1 Amendments to model control codes

Goomax provided the mandatory MCC data for its domestic and Australian sales. Goomax sold only one variant of alloy-temper code for the domestic market.

Goomax provided only the mandatory MCC cost data for both domestic and export sales i.e. for finish. Goomax reported production and sales of two additional finishes compared to the suggested MCC structure.

Exception 1: Modification of MCC

Description: Goomax proposed the inclusion of two additional finishes to the MCC structure, namely electrophoresis and woodgrain finishes. The verification team noted that Goomax produced and sold electrophoresis and woodgrain on the domestic market and only produced and sold woodgrain on the Australian market.

Resolution: The verification team agreed to add these two additional finishes to the MCC structure noting the differences in price and cost when compared to the other finishes. The verification team is satisfied that the additional finishes are the goods under consideration. The codes for these additional finishes are WG for woodgrain and E for electrophoresis.

The verification team sought details of cost to make difference for each of the finishes, including the two finishes added to the amended MCC structure. The verification team found a clear cost to make and price differences between the two finishes, i.e., electrophoresis and woodgrain from the rest of the finishes.

2.3 Verification of model control codes

Table 1 details how the team determined MCC sub-categories and verified them to source documents.

Category	Sub-category verification method
Finish	Purchase order and commercial invoice for both export and domestic sales identify the finish of the goods sold.
Alloy code	Commercial invoice for export sales identifies the alloy code of the goods sold.

Table 1 MCC sub-category determination

2.4 The Australian export goods and domestic like goods

2.4.1 Australian export goods (the goods under consideration)

The team is satisfied that, during the review period, Goomax produced the goods under consideration (Australian export goods) and exported them to Australia.

2.4.2 Domestic like goods (like goods sold in the domestic market)

The team is satisfied that Goomax produced and sold like goods for home consumption in its domestic market, being the country of export (domestic like goods).

The team considers that the domestic like goods were identical to, or had characteristics closely resembling, the Australian export goods, because:

- **Physical likeness:** Goomax does not distinguish between domestic like goods and the Australian export goods during production (although not all MCCs are exported to Australia). The goods domestically sold by Goomax and exported to various Australian buyers have similar physical appearances factoring in the different shapes of profiles.
- **Production likeness:** Goomax does not distinguish between the goods to be sold domestic market and that exported during the production stage. Same set of production line and plants are used in the production of goods sold in domestic market and exported.
- **Commercial likeness:** The domestically sold aluminium extrusions by Goomax are distributed in similar manner as those exported.
- **Functional likeness:** The aluminium extrusions sold in the domestic market are considered functionally alike to the one exported as they have similar uses.

2.5 List of model control codes

Goomax produced, sold or both produced and sold the following MCCs during the review period:

Australian Sales	Australian CTM	Domestic Sales	Domestic CTM
A-6A-T1-1 A-O-T1-1	A	A-6A-T1-1	A
M-6A-T1-0 M-6C-T1-0	M	E-6A-T1-1	E
PC-6A-T1-0 PC-O-T1-0	PC	M-6A-T1-0	M
WG-6A-T1-0	WG	PC-6A-T1-0	PC
		WG-6A-T1-0	WG

Table 2: List of MCCs produced or sold

2.6 Like goods assessment

The team considers that goods Goomax produced and sold for domestic home consumption had characteristics closely resembling those of the Australian export goods and were therefore 'like goods' according to section 269T(1).

3 Verification of sales completeness and relevance

The commission typically verifies sales as complete and relevant by reconciling the revenue and quantity in sales listings up to management accounts and then audited financial accounts. ADN 2016/30 further describes this verification process.

The verification team verified whether the sales listings Goomax submitted are complete and relevant by reconciling them to the audited financial statements, consistent with ADN 2016/30.

The team verified whether the sales data was complete and relevant by:

1. The total revenue for the 2021 financial year as reported in the income statement was verified against general ledger for 2021 in Goomax's accounting system. The team confirmed that the two income accounts, namely main business income and other operating income reconcile with the figure provided for the 2021 financial year.
2. The combined figures of the two income accounts referred to above were then used to reconcile the total company sales revenue during the period. The team referred to figures from the half yearly trial balances, subtracting the half-year period ending in June 2021 and adding June 2022.
3. To verify the domestic, Australian and third-country sales, the team first verified the non-GUC by reconciling each account with its respective trial balance account for the period. Therefore, to verify domestic, Australian and third-country sales, the verification team reconciled remainder of the value which in combination with the verified non-GUC value figure, makes up the verified overall figure.

The team identified the issues outlined below. The team detailed this process in the verification work program and its relevant attachments in **confidential attachment 1**.

3.1 Sales completeness and relevance exceptions

Exception 2: Error noted in export sales listing regarding gross invoice value calculation

Description: The issue relates to the calculation of the gross invoice value for sample sale 13 in Goomax's Australian export sales listings. To calculate the invoice value at FOB, Goomax's initial formula included the EXW price plus expenses which were unrelated to the goods, namely labour cost for re-assembling and packing for non-GUC.

Resolution: Goomax provided the verification team an updated B-2 Australian export sales listing which amended the calculation of the gross invoice value for sample sale 13. Goomax also provided evidence to substantiate the reworking of sales value. The team is satisfied that sample sale 13 within the updated export sales listing does not contain expenses related to non-GUC in its formula for calculating the gross invoice value.

3.2 Sales completeness and relevance finding

The team is satisfied that the sales data Goomax submitted is complete and relevant, including the revision outlined in the exception above.

4 Verification of sales accuracy

The commission typically verifies sales as accurate by reconciling a selection of volume, revenue, and other key data in the sales listings down to source documents. ADN 2016/30 further describes this verification process.

The team verified whether the export and domestic sales listings Goomax submitted are accurate by reconciling them to source documents, consistent with ADN 2016/30.

The team identified the issue outlined below. The team detailed this process in the verification work program and its relevant attachments in **confidential attachment 1**.

4.1 Sales accuracy exceptions

Exception 3: Incomplete domestic inland transport cost allocation

Description: While assessing the inland transport allocation for Goomax's domestic sales listing, the verification team noted that the formula used to calculate the allocation did not include all relevant expenses. Goomax confirmed that the inland transport costs in the allocation included fuel, fees relating to fuel, insurance, maintenance and repair. However, costs including depreciation and cost of labour were not included, in turn resulting in underestimated inland transport costs.

Resolution: Goomax agreed to provide the team an updated domestic sales listing which included a reworked allocation of inland transport costs. The team is satisfied that the re-worked allocation includes all aspects relevant to domestic inland transport.

4.2 Sales accuracy finding

The team is satisfied that the sales data Goomax submitted is accurate, including any revision outlined in the exception above.

5 Verification of cost to make and sell completeness and relevance

The commission typically verifies cost to make and sell (CTMS) as complete and relevant by reconciling the total cost to make (CTM) and selling, general and administrative (SG&A) expenses in cost listings up to management accounts and then audited financial accounts. ADN 2016/30 further describes this verification process.

The team verified whether the CTM and SG&A listings Goomax submitted are complete and relevant by reconciling it to audited financial statements, consistent with ADN 2016/30.

The team verified the CTM data as complete and relevant by:

1. Reconciling the total cost of goods sold (COGS) for the financial year to the reported cost of sales in the fully year financial statement for the period FY2021.
2. Reconciling the reported cost of goods sold for the review period by identifying the COGS for the period overlapping the financial year and the review period and combining it with the cost of goods sold for review period falling outside the financial year.
3. Deriving the cost of production for the review period after reconciling the finished goods inventory changes from the trial balance.
4. Verifying the cost of production data relevant to GUC and non-GUC from the trial balance and cost accounting system.

The team verified the SG&A data as complete and relevant by:

1. The FY2021 SG&A expenses in the G-4.1 SG&A listing were reconciled to the total of operating expense, and financial expenses (SG&A expenses) in the FY2021 income statement.
2. The review period SG&A expenses in the G-4.1 SG&A listing were reconciled to the SG&A expenses using the FY2021 income statement and trial balance. The team adjusted the SG&A expenses by deducting the SG&A expenses for the period January to June 2021 from the FY2021 audited income statement and adding the SG&A expenses for the period January to June 2022. The team verified the SG&A expenses for these periods to the accounting system.
3. The team reviewed the G-4.1 SG&A listing to identify expenses which should be excluded from the SG&A calculation.
4. The team reviewed the categorisation of direct selling expense in the G-4.1 SG&A listing to ensure that these are reported as a direct selling expense in the sales listing.

5.1 Cost to make and sell completeness and relevance exceptions

During verification, the team identified the issues outlined below. The team detailed this process in the verification work program and its relevant attachments in **confidential attachment 1**.

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Exception 4: Revision of the misclassified direct selling expenses

Description: While verifying the direct selling costs allocated by Goomax to the domestic sales, the team noted that initial allocation amount did not capture all the expenses relating to inland transport expense.

Resolution: Goomax in consultation with the verification team identified the additional inland transport expenses not allocated to domestic direct selling expenses and hence shown as part of general selling expenses in the initial response. Goomax revised G-4.1 and G-4.2 and added additional expense items to direct selling expenses and made a corresponding adjustment/reduction from the general selling expenses in the SG&A expense listing. The verification team is satisfied with the revised calculation after reconciling it to trial balance.

Exception 5: Revision of the misclassified direct selling expenses

Description: While assessing the general administration expenses items, the verification team noted a negative expenses item i.e., a credit relating to payment by social security department relating to industrial accident claims. This item reduced the total SG&A expenses by the corresponding amount. As the payment was not related to the review period, the verification team suggested that such credit items be removed from the SG&A listings.

Resolution: Goomax agreed to the team's suggestion that this credit item be removed from the SG&A listing and hence the SG&A expenses increased to the same extent. The team marked that particular negative SG&A item as zero for the review period.

5.2 Cost to make and sell completeness and relevance finding

The team is satisfied that the CTMS data Goomax submitted is complete and relevant, including any revision outlined in the exception above.

6 Verification of cost to make and sell accuracy

The commission typically verifies CTMS as accurate by reconciling a selection of volume, cost and other key data in the CTM and SG&A listings down to source documents. ADN 2016/30 further describes this verification process.

The team verified whether the CTM and SG&A listings Goomax submitted are accurate by reconciling them to source documents, consistent with ADN 2016/30.

The team did not identify any issues. The team detailed this process in the verification work program and its relevant attachments in **confidential attachment 1**.

6.1 Cost allocation method

Table 3 outlines how the team allocated each cost component.

Cost component	Method applied
Raw materials	Goomax uses the weighted average cost of raw materials to allocate to goods based on production quantity.
Scrap offset	Goomax does not explicitly mark the internally generated aluminium scrap as on cost offset in the CTM listings. All the internally generated scraps are melted and reintroduced to the production line and are factored in the material costs.
Direct labour	Goomax allocates labour cost based on the actual labour cost incurred in each of the workshop. All the extrusion workshop direct labour costs are allocated all finishes based on volume of production. As against this, the total direct labour cost incurred in Powder coating workshop is allocated to only the powder coated extrusions produced during the relevant period.
Electricity	Electricity, the largest component of Manufacturing overhead is allocated on the basis of actual production volume on relevant production centres. The total actual electricity charges of extrusion and melting shop are allocated to all finishes based on production volume. However, electricity costs of specific finish workshops are allocated only those specific finishes based on production volume for the relevant period.
Depreciation	Goomax allocates depreciation cost based on a fixed asset list for each workshop. Depreciation at fixed rate is applied to all assets for the relevant period. This total depreciation fixed cost is allocated to the relevant production quantity of each of those production centres.

Table 3: Cost allocation method

6.2 Cost to make and sell accuracy finding

The team is satisfied that the CTMS data submitted by Goomax is accurate and reasonably reflects the costs associated with the production and sale of the goods.

7 Export price

7.1 Background

Section 269TAB states the general rules for calculating export price. Under this section, the commission assesses the following to identify the correct method of calculating export price:

- Who is the importer?
- Who is the exporter?
- Did the importer purchase from the exporter at arms length?

This chapter discusses how the team assessed Goomax's Australian export sales.

7.2 The importers

The team considers that the customer listed for each sale of the Australian export goods was the beneficial owner of these goods at the time of importation into Australia and, therefore, the importer. For each sale, the relevant customer:

- was named as the customer on the commercial invoice
- was named as the consignee on the bill of lading
- was named as the importer on the importation declaration to ABF
- was responsible for all the importation charges

7.3 The exporter

The team considers Goomax to be the exporter of the Australian export goods² because Goomax:

- produced the Australian export goods
- is named as the supplier on the commercial invoice
- is named as consignor on the bill of lading
- arranged and paid for inland transport to the port of export for exports on shipment terms of FOB and CIF
- arranged and paid for port handling charges at the port of export for exports on shipment terms of FOB and CIF
- arranged and paid for ocean freight and marine insurance for export on shipment terms of CIF

7.4 Australian export arms length assessment

7.4.1 Unrelated customers

The team assessed whether Goomax sold the Australian export goods at arms length to any unrelated customers during the review period.

² The commission generally identifies the exporter as a principal in transacting the Australian export goods, located in the country of export and either:

- gave up responsibility by knowingly placing the goods in the hands of another company, or its own vehicle, for delivery to Australia
- owned the goods, either at the time the goods were shipped or previously.

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The team found no evidence that:

- there was consideration payable for, or in respect of, the goods other than its price
- the price appeared to be 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
- the buyer, or an associate of the buyer, was directly or indirectly reimbursed, compensated or otherwise receive a benefit for, or in respect of, the whole or any part of the price.

The team notes that Goomax:

- sold goods at similar prices to all unrelated customers
- referred to the market price index of raw materials and processing fee when determining selling price to the Australian market
- appeared to genuinely negotiate the price with unrelated customers.

The team therefore considers that, for all the unrelated customer sales, Goomax sold the Australian export goods at arms length.³

7.5 Export price assessment

In respect of Australian sales of the goods by Goomax, the team recommends that the export price be determined under section 269TAB(1)(a), being the price paid by the importer to the exporter less transport and other costs arising after exportation. To ensure that the ascertained export price is calculated using a consistent delivery term, the team has added an amount for inland transport and/or port charges where required to certain export transactions.

The team has calculated export price at **confidential appendix 1**.

³ See section 269TAA.

8 Domestic sales

8.1 Background

Section 269TAC states the general rules for calculating normal value.

Under section 269TAC(1), the normal value of any goods exported to Australia is the price paid or payable for like goods sold in the ordinary course of trade (OCOT) for home consumption in the country of export in sales that are arms length transactions or, if like goods are not so sold by the exporter, by other sellers of like goods.

Section 269TAC(2) sets out how normal value is to be ascertained if it cannot be ascertained under section 269TAC(1). In particular, if, in accordance with section 269TAC(2)(a)(ii), the Minister⁴ is satisfied that the normal value of the goods exported to Australia cannot be ascertained under section 269TAC(1) because ‘the situation in the market of the country of export is such that sales in that market are not suitable for use in determining a price under [section 269TAC(1)]’⁵, the normal value is such amount as the Minister determines in accordance with sections 269TAC(2)(c) or 269TAC(2)(d).

8.1.1 Particular market situation

The current variable factors applying to exporters of the goods from China, including Goomax, were ascertained in Continuation Inquiry 543 (case 543). Case 543 included a finding that the situation in China was such that sales in its domestic market were not suitable for determining a price under section 269TAC(1). In case 543, normal values for cooperating exporters were calculated under section 269TAC(2)(c).

Case 609 is examining whether the particular market situation continues to apply. The commission’s findings will be outlined in the statement of essential facts (SEF).

In the interim, the team have prepared this report consistent with case 543 and have preliminarily calculated Goomax’s normal value under section 269TAC(2)(c). This is subject to change.

8.2 Domestic arms length assessment

8.2.1 Unrelated customers

The team assessed whether Goomax sold like goods domestically at arms length to any unrelated customers during the review period.

The team found no evidence that:

- there was consideration payable for, or in respect of, the goods other than its price
- the price appeared to be 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
- the buyer, or an associate of the buyer, was directly or indirectly reimbursed, compensated or otherwise receive a benefit for, or in respect of, the whole or any part of the price.

⁴ The Minister for Industry, Science and Resources.

⁵ The commission refers to this situation as a ‘particular market situation’.

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The team notes that Goomax:

- sold domestic like goods at similar prices to all unrelated customers
- referred to the market price index of raw materials and processing fee when determining selling price
- appeared to genuinely negotiate the price with unrelated customers.

The team therefore considers that, for all the unrelated customer domestic sales, Goomax sold at arms length.⁶

8.2.2 Related customers

Goomax made no sales to any related customers during the review period.

8.3 Ordinary course of trade assessment

Case 609 includes a claim that China, including Goomax's costs data, does not reasonably reflect competitive market costs associated with the production of domestic like goods.

The commission is currently considering this claim. Therefore, the team has referred the assessment of whether domestic sales are in the OCOT to the case management team for consideration.

8.4 Profit assessment

Where the commission is required to calculate a normal value under section 269TAC(2)(c), an amount of profit must be worked out under section 45 of the *Customs (International Obligations) Regulation 2015* (Cth) (the Regulation).

The team calculated an amount of profit based on the profit achieved on all domestic sales of like goods in the OCOT in accordance with section 45(2) of the Regulation.

The team's domestic profit calculation is at **confidential appendix 3**.

⁶ See section 269TAA.

9 Adjustments

To properly compare an export price of the Australian export goods to the corresponding normal value, the team considered applying each of the following adjustments.

9.1 Rationale and method

Adjustment type	Assessment for adjustment	Calculation method and evidence	Claimed in REQ?	Adjustment required?
Domestic credit terms	Domestic credit adjustment is not required as all domestic sales are on cash or 'pre-paid' basis.	No applicable	No	No This adjustment is not required if normal value is to be determined under section 269TAC(2)(c).
Domestic inland transport	All domestic sales are on 'delivered' deliver terms as opposed to EXW/FOB/CIF terms for export sales. A downward adjustment to the normal value is required for a fair comparison to the export price. However, if normal value is determined under 269TAC(2)(c) this adjustment is not required.	The team derived the inland domestic transport charges from the total transport charges incurred by Goomax over the period and applying it over the total volume of goods transported in the domestic market.	Yes	No This adjustment is not required if normal value is to be determined under section 269TAC(2)(c).
Export inland transport	Goomax incurred inland transport charges on all export shipments to Australia excluding those on EXW. An upward adjustment to the normal value is necessitated for fair comparison.	The verification calculated the unit export inland transport by deriving the weighted average actual inland transport charges incurred by Goomax to transport the goods to the port of export.	Yes	Yes
Export Handling & Other	Goomax incurred handling & other expenses in relation to all Australian sales except those on 'EXW' shipping terms. An upward adjustment to normal value is required for a fair comparison.	The verification team calculated the unit export handling & other charges from the weighted average actual Handling & other charges incurred by it during the review period.	Yes	Yes

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Adjustment type	Assessment for adjustment	Calculation method and evidence	Claimed in REQ?	Adjustment required?
Export credit terms	Goamax offered credit terms for certain Australian sales. For fair comparison with Export price, the normal value should be upward adjusted for appropriate credit costs.	The team derived export credit costs by applying the short-term borrowing rate to the payment terms for such export transactions.	Yes	Yes

Table 4: Assessment of adjustments

9.2 Adjustments

The team recommends the following adjustments so to properly compare export price of the Australian export goods to the corresponding normal value.

Adjustment Type	Deduction/addition
Export inland transport charges	Add an amount for export inland transport
Export handling & other charges	Add an amount for export handling & other charges
Export credit terms	Add an amount for export credit terms

Table 5: Summary of adjustments

10 Normal value

As mentioned in chapter 8, case 609 is examining whether the situation in the market in the country of export is such that sales in that market are not suitable for use in determining a normal value under section 269TAC(1), in accordance with section 269TAC(2)(a)(ii). Where section 269TAC(2)(a)(ii) is satisfied, normal value may be constructed under section 269TAC(2)(c). The commission is currently considering these claims and will make a determination in the SEF.

However, on the basis of the commission's findings in case 543, the team has preliminarily calculated Goomax's normal value under section 269TAC(2)(c) for the purpose of this report, which is subject to change.

10.1 Constructed normal value

The team has constructed Goomax's normal value under section 269TAC(2)(c) using the sum of:

- the cost to make that reasonably reflect competitive market costs
- SG&A on the assumption that the goods, instead of being exported, were sold for home consumption in the OCOT in the country of export based on the company's records in accordance with section 44(2) of the Regulation
- an amount for profit based on data relating to the production and sale of like goods in the domestic market in the OCOT in accordance with section 45(2) of the Regulation.

The team's normal value calculations are at **confidential appendix 4**.

10.1.1 Cost of production

The case management team has assessed the primary aluminium input costs in the Australian export CTM calculation for Goomax and determined that the costs do not reasonably reflect competitive market costs associated with the production of like goods.

The team has applied a competitive benchmark cost for primary aluminium provided by the case management team, consistent with that used in case 543.

10.1.2 SG&A expenses

The team has used Goomax's SG&A based on its records.

10.1.3 Profit

As mentioned in chapter 8, the team calculated an amount of profit based on the profit achieved on all domestic sales of like goods in the OCOT in accordance with section 45(2) of the Regulation.

10.1.4 Adjustments

The team recommends that certain adjustments are necessary to ensure that normal values are properly comparable with export prices, in accordance with section 269TAC(9) and as outlined in chapter 9.

11 Dumping margin

The team calculated Goomax's dumping margin by comparing weighted average Australian export prices to the corresponding weighted average normal values for the review period under section 269TACB(2)(a).

The team calculated exporter's dumping margin as **negative 7.5%**.

The dumping margin calculation is at **confidential appendix 5**.

12 Subsidies

The commission typically verifies subsidy information as complete and relevant by reconciling the list of subsidy programs up to management accounts and then audited financial accounts. The commission typically verifies subsidy information as accurate by reconciling each subsidy program down to source documents. ADN 2016/30 further describes these verification processes.

The team verified whether the subsidy information Goomax submitted is complete and relevant by reconciling it to audited financial statements, consistent with ADN 2016/30 except for reconciliation to the audited results. As described in section 1 of this report, Goomax did audit its financial result. The Commission performed the reconciliation to the financial statement of the company.

The team verified whether the subsidy information Goomax submitted is accurate by reconciling it to source documents, consistent with ADN 2016/30.

Exception 6: Revision in the 'I-1 Company turnover'

Description: As Goomax revised certain data relation to B-2 sales as described in the Exception 2 in chapter Sales completeness and relevance exceptions3.1, the previously provided I-1 Company turnover was no longer reflecting accurately the revised B-2 sales listings.

Resolution: Goomax provided a revised 'I-1 Company turnover' that accurately reflected the revised sales listings. The verification team verified the supporting documents provided to update the sales listings and the rationale for revising the company turnover. The verification team is satisfied with the revised company turnover table.

12.1 Less than adequate remuneration

The team verified the raw material purchase listing Goomax submitted as complete and relevant by reconciling it to Goomax's general ledger. The team verified the listing as accurate by reconciling it to source documents.

The team also collected information on whether a State Invested Enterprise supplied or produced the raw material Goomax used.

The team did not identify any issues. The team detailed this process in the verification work program and its relevant attachments in **confidential attachment 1**.

12.2 Tax benefits

The team verified the income tax information Goomax submitted as complete and relevant by reconciling it to Goomax's tax returns. The team verified the information as accurate by reconciling it to proof of payment documents.

The team did not identify any issues. The team detailed this process in the verification work program and its relevant attachments in **confidential attachment 1**.

12.3 Financial grants

The team verified the financial grants listing Goomax submitted as complete and relevant by reconciling it to Goomax’s general ledger. The team verified the listing as accurate by reconciling it to source documents.

The team did not identify any issues. The team detailed this process in the verification work program and its relevant attachments in **confidential attachment 1**.

12.4 Subsidy margin

The team found that Goomax received a benefit in relation to a number of programs. The team attributed and allocated the received benefit to the Australian export goods as follows:

Program name	Attribution and allocation of the subsidy
Municipal-level subsidy fund for enterprises participating the domestic exhibitions for 2018 (2021-Grant 11)	Attributed to domestic sales by value as it relates to grant for domestic exhibition.
Provincial-level special subsidy for promoting stable production and employment of industrial enterprises during Spring Festival 2021 (2021-Grant 12)	Attributed to the whole of the company by value.
Reward for increasing production and efficiency of Nan’an City during New Year’s Day and Spring Festival 2021 (2021-Grant 13)	Attributed to the whole of the company by value.
Supporting fund for foreign economy and trade of Nan’an City for 2020 (2021-Grant 14)	Attributed to export sales by value.
Program number 79 - The invention patent award in 2020 (2021-Grant 15)	Attributed to non-GUC by value only as the program pertains to glass windows i.e., non-GUC
Provincial and municipal level special fund for trade 2021 (2021-Grant 16)	Attributed to export sales by value.
The 3rd batch of talent rewards for supporting enterprise restructuring, listing and over-the-counter listing in 2021 (2021-Grant 17)	Attributed to the whole of the company by value.
Subsidy fund for exhibitions in the first half of 2021 (2021-Grant 18)	Attributed to export sales by value.
2021 Vocational Skills Improvement Training Subsidy (2021-Grant 19)	Attributed to the whole of the company by value.
2020 Unemployment Insurance Stabilization Subsidy (2021-Grant 20)	Attributed to the whole of the company by value.
Reward fund for enterprises absorbing the poverty population for employment across provinces (2021-Grant 21)	Attributed to the whole of the company by value.

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Subsidy for enterprise R&D expenditure for 2020 (2021-Grant 22)	Attributed to the whole of the company by value.
The 2nd batch of subsidy for enterprise R&D expenditure of 2020 (2022-Grant 1)	Attributed to the whole of the company by value.
Provincial-level reward fund for “Specialized-Refinement-Differential-Innovation” small and medium-sized enterprises of 2021 (2022-Grant 2)	Attributed to the whole of the company by value.
One-time labor service subsidy for enterprise interprovincial labor service cooperation (2022-Grant 3)	Attributed to the whole of the company by value.
Provincial-level reward of green factory (2022-Grant 4)	Attributed to the whole of the company by value.
Settlement subsidy for college graduates (2022-Grant 5)	Attributed to the whole of the company by value.
The 1st batch of municipal-level special subsidy for energy conservation and circular economy in 2022 (2022-Grant 6)	Attributed to the whole of the company by value.
Provincial-level implementing standard reward fund for integration of Informatization and Industrialization management system (2022-Grant 7)	Attributed to the whole of the company by volume.
Tax regulation allowing additional tax credits for R&D expenses	Attributed to the whole of the company by value.

Table 6: Subsidy programs

On the basis that the commission finds these programs to be countervailable subsidies, the team has calculated the subsidy margin for Goomax during the review period as **0.8%**.

The team detailed the subsidy margin calculation in **confidential appendix 6**.

13 Appendices and attachments

Confidential appendix 1	Export price
Confidential appendix 2	Cost to make and sell
Confidential appendix 3	Cost replacement
Confidential appendix 4	Normal value
Confidential appendix 5	Dumping margin
Confidential appendix 6	Subsidy margin
Confidential attachment 1	Verification work program