



Australian Government
Department of Industry,
Science and Resources

Anti-Dumping Commission

IMPORTER QUESTIONNAIRE

Anti-circumvention inquiry No. 693



Case number 693

Product 2,4-Dichlorophenoxyacetic acid

From Malaysia

Inquiry period From 1 July 2019

Section	Response due by
A	Thursday 15 January 2026
B, C & D	Wednesday 11 February 2026 extended to Wednesday 4 March 2026

Email response to investigations4@adcommission.gov.au

Commission website www.adcommission.gov.au

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INSTRUCTIONS

Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (**the commission**) is conducting an anti-circumvention inquiry in relation to the dumping duty notice (**the original notice**) applying to 2,4-Dichlorophenoxyacetic acid (**2,4-D**, or **the goods**) exported to Australia from the People's Republic of China. Anti-Dumping Notice No 2026/001¹, available on the commission's website, provides details of the goods under consideration, the application and the investigation procedures.

The initiation of this inquiry follows an application lodged by Nufarm Limited (**Nufarm**, or **the applicant**), a producer of 2,4-D in Australia. Nufarm alleges that there has been circumvention activity involving exports of 2,4-D to from Malaysia to Australia. Nufarm claims the circumvention of the original notice on China has occurred by way of the following.

- Assembly of the goods in a third country (not subject to the dumping notice) from parts manufactured in China
- Export of the goods through one or more third countries (not subject to the dumping notice)

Specifically, Nufarm alleges that the goods exported to Australia from China through Malaysia have circumvented the original notice because

- 2,4-D products exported to Australia from Malaysia are of 2,4-D acid that is exported from China to Malaysia and assembled into a formulation product in Malaysia before its export to Australia
- 2,4-D exports from China have been exported through Malaysia before their importation into Australia.

The commission will examine as part of this inquiry 2,4-D exported to Australia from Malaysia (**the circumvention goods**) and whether the circumvention goods are of 2,4-D that is sourced from China.

The commission will use the information you provide to determine whether a circumvention activity has occurred, and to make recommendations about potential alterations to the original notice should a circumvention activity be found to have occurred.

The commission will collect and use information in accordance with the commission's Collection and Use of Information Policy.

Inquiry Process

The anti-circumvention inquiry will examine whether a circumvention activity assembly of parts in a third country and/or exports of goods through a third country has occurred.

The commission will examine alleged circumvention goods exported to Australia from Malaysia from 1 July 2019 to determine whether the alleged circumvention activity has occurred.

¹ Anti-Dumping Notice No 2026/001

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After the inquiry, the Commissioner of the Anti-Dumping Commission (**the Commissioner**) will provide a report and recommendations to the Minister, unless the inquiry is terminated earlier. This report will recommend to the Minister that the original notice

- remain unaltered, or
- be altered following a finding that circumvention activity in relation to the original notice has occurred, and the alterations to be made.

After considering the report and any other information that the Minister considers relevant, the Minister may leave the original notice unaltered or alter the original notice, specifying different goods that are subject to the notice/s, and altering variable factors in respect of certain exporters subject to the notice.

The inquiry will be carried out in accordance with Part XVB of the *Customs Act 1901* (**the Act**).

If you do not import the goods or unsure whether you import the goods

Our records indicate that your company is an importer of the goods, and as such, your company is being asked to complete this importer questionnaire. If this is incorrect and your company is not an importer of the goods, or if you are unsure whether the products imported by your company are the goods, please contact the commission as soon as possible.

What happens if you do not respond to this questionnaire?

You do not have to complete the questionnaire. However, if you do not respond, do not provide all the information sought, do not provide information within a reasonable time, or do not allow the commission to verify the information, the commission may have regard to any other matters or information that it considers relevant, including the information submitted by the applicant in its application.

Alternatively, you may wish to make a submission concerning the inquiry, no later than 13 February 2026. Instructions on making a submission are in Anti-Dumping Notice No. 2026/001.

Extension requests

If you require a longer period to complete all or parts of your response to this importer questionnaire, you must submit a request to the commission, in writing, for an extension to the due date for all or part of the questionnaire. This request must be made prior to the due date. A request for extension will be rejected if received after the due date. Requests can be submitted to investigations4@adcommission.gov.au

When considering the extension request, the commission will have regard to:

- the commission's responsibility to conduct the case in a timely and efficient manner
- the reasons why you could not provide a response within the whole period and not only the period remaining between the request and the due date
- ordinary business practices or commercial principles
- the commission's understanding of the relevant industry

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- previous correspondence and previous dealings with your company
- information provided by other interested parties.

More information on extensions can be found in the Customs (Extension of Time and Non-cooperation) Direction 2015 at <https://www.legislation.gov.au/Details/F2015L01736>.

You will be informed of the decision whether your request for an extension has been rejected, granted in full or granted in part. For example, you may be granted an extension to submit all sections except for Section A or you may be granted a shorter extension than you requested.

Submitting a response to the importer questionnaire

Responses to the importer questionnaire should be lodged by email listed on the cover page. In submitting the response to the importer questionnaire, you must answer all questions and include all attachments and spreadsheets.

You are required to lodge a confidential version (for official use only) and a non-confidential version (for public record) of your response to this questionnaire by the due date. Please ensure that each page of information you provide is clearly marked either 'FOR OFFICIAL USE ONLY' or 'PUBLIC RECORD'.

All information provided to the commission in confidence will be treated accordingly. The public record version of your questionnaire will be placed on the public record and must contain sufficient detail to allow a reasonable understanding of the substance of the information but does not breach confidentiality nor adversely affect those interests.

A person is not required to provide a summary for the public record if the commission can be satisfied that no such summary can be given that would allow a reasonable understanding of the substance of the information.

All questionnaires are required to have a bracketed explanation of deleted or blacked out information for the public record version of the questionnaire. An example of a statement to accompany deleted/blacked out text is:

[Explanation of cost allocation through the divisions, by reference to machine hours or weight].

If such an explanation is not provided, the commission may disregard the information in the submission. Where the public record version of your response to the questionnaire does not contain sufficient detail, your company may be deemed to have significantly impeded the case and be deemed an uncooperative exporter.

Verification of the information that you supply

The commission may visit your company to verify the information your company provides. We will be in further contact with your company to negotiate a mutually convenient visit timeframe, if required.

For such a visit to run smoothly, the commission representatives will need to speak with key company personnel, such as those responsible for imports, sales, and company accounts. It would be appreciated if all relevant company records requested, including import documentation, sales information, financial data and any working papers were made available to the commission officers.

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The commission appreciates that some of these documents, particularly financial statements, may be confidential to your business and understands a possible reluctance to supply such sensitive information. If the commission cannot gain access to the relevant documentation, it may not be able to use your cost and sales information and may have to rely on other information to assess the Australian industry's claims.

It is important that you fully understand the anti-circumvention inquiry process, and the role of the commission in carrying out the inquiry. To this end, the proposed visit to your company will be useful for us to explain in detail the inquiry procedures and related issues.

For information on the commission's verification procedures, refer to Anti-Dumping Notice No. 2016/30 available on the commission's website.

Important instructions for preparing your response

- All questions in this importer questionnaire must be completed. If a question is not applicable to your situation, please answer the question with 'Not Applicable' and provide an explanation as to why.
- All questions must be answered in English. An English translation must be provided for documents not originally in English. To the extent that the foreign language version differs, the English translation will be given priority as a matter of interpretation in Australia.
- Clearly identify all units of measurement (e.g. KG) and currencies (e.g. AUD) used. Apply the same units of measurement consistently throughout your response to the questionnaire.
- Label all attachments to your response according to the section of the questionnaire it relates to (e.g. label the chart of accounts as Attachment D-18)
- The data must be created as spreadsheet files in Microsoft Excel.
- If you have used formulas to complete spreadsheets, these formulas must be retained and not hard-coded.
- You must retain all worksheets used in answering the questionnaire. Be prepared to provide these worksheets during the commission's verification of your data.
- If you cannot present electronic data in the requested format, contact the commission as soon as possible.
- Where possible, electronic data should be shared with the commission via SIGBOX, a secure online document repository. Please contact the commission to request access to SIGBOX if required.
- Please be aware that, if at any stage during this inquiry you become aware that you have inadvertently received confidential information submitted by another party to this process (for example, via email), you have a responsibility to:
 - Notify the commission
 - Delete the information from your system and
 - Refrain from using, sharing, or retaining the information in any way.

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GOODS SUBJECT TO ANTI-DUMPING MEASURES

Original notice

Anti-dumping measures were initially imposed on 24 March 2003 by the then Minister for Justice and Customs following consideration of Trade Measures Report No 58 (**REP 58**). These measures are applicable to all exporters from China.

The goods the subject of the notice

2,4-D is a selective herbicide exported to Australia from China, mainly in the forms of 2,4 D acid and 2,4-D ester.

The goods subject of the application ("the goods") are:

- sodium salt
- 2,4-D acid
- 2,4-D intermediate products (salts and esters), including
 - iso butyl ester technical
 - ethyl ester technical
 - 2 ethyl hexyl ester technical
 - dimethylamine and
 - iso-propylamine
- 2,4-D fully formulated products, and
- all other forms of 2,4-D.

The goods are generally, but not exclusively, classified to the following tariff subheadings in Schedule 3 to the *Customs Tariff Act 1995*.

TARIFF SUBHEADING	STATISTICAL CODE	UNIT	DESCRIPTION
2918	CARBOXYLIC ACIDS WITH ADDITIONAL OXYGEN FUNCTION AND THEIR ANHYDRIDES, HALIDES, PEROXIDES AND PEROXYACIDS; THEIR HALOGENATED, SULPHONATED, NITRATED OR NITROSATED DERIVATIVES		
2918.99.00	43	Kg	2,4-Dichlorophenoxyacetic acid (free acid) (2,4-D) (CAS 94-75-7)
2918.99.00	44	Kg	Salts and esters of 2,4-dichlorophenoxyacetic acid
2918.99.00	48	Kg	Other

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3808	INSECTICIDES, RODENTICIDES, FUNGICIDES, HERBICIDES, ANTI-SPROUTING PRODUCTS AND PLANT-GROWTH REGULATORS, DISINFECTANTS AND SIMILAR PRODUCTS, PUT UP IN FORMS OR PACKINGS FOR RETAIL SALE OR AS PREPARATIONS OR ARTICLES (FOR EXAMPLE, SULPHUR-TREATED BANDS, WICKS AND CANDLES, AND FLY-PAPERS):		
3808.93.00	61	Kg	Goods with a basis of 2,4-dichlorophenoxyacetic acid, its salts or esters
3808.93.00	71	Kg	Goods wholly of, or with basis of 2,4-dichlorophenoxyacetic acid, its salts or esters
3808.93.00	79	Kg	Other ²

Table 1: Tariff classifications

² This tariff classification is to capture products that contain 2,4-D and another herbicidal active ingredient.

THE CIRCUMVENTION GOODS

The goods subject to the anti-circumvention inquiry are described in the application being of 2,4-D in the following forms

- sodium salt
- 2,4-D acid
- 2,4-D intermediate products (salts and esters), including
 - iso butyl ester technical
 - ethyl ester technical
 - 2 ethyl hexyl ester technical
 - dimethylamine and
 - iso-propylamine
- 2,4-D fully formulated products, and
- all other forms of 2,4-D.

The circumvention goods are allegedly being **imported into Australia from Malaysia** under tariff subheading of Schedule 3 to the *Customs Tariff Act 1995*:

- 2918.99.00 (statistical codes 43, 44, 48)
- 3808.93.00 (statistical codes 61, 71, 79)

MODEL CONTROL CODE

Details of the model control code (MCC) structure for the goods are detailed in the table below. The sales listing requested at Section D-1 and submitted in this response must follow this MCC structure. At a minimum, the data must report sales for each of the mandatory MCC categories identified by the commission.

Category	Sub-Category		Sales Data
Form (of 2,4-D)	T	Technical ³	Mandatory
	F	Formulation ⁴	
Product Type	A	Acid	Mandatory
	E	Esters	
	S	Amines/Salts	
	M	Mixtures ⁵	
Strength (of 2,4-D)	### ⁶	% (w/v) 2,4-D Acid	Mandatory

Table 2: Proposed MCC structure

If there are models manufactured and sold by your company that do not align within the MCC structure above, this should be raised by lodging a submission with the commission as soon as is practicable, but no later than the time this questionnaire is due, otherwise the response may be considered deficient.

³ Technical 2,4-D: These are the active ingredient forms of 2,4-D that have herbicidal activity, but is not fit for use by end users. Note that amine/salt forms are rare as a saleable unit, as they are typically formed as part of the formulation process.

⁴ Formulation 2,4-D: These are the products that end users apply as herbicides, which contain an active ingredient form of 2,4-D.

⁵ 'Mixture' formulation category are for herbicide formulations which contain a second or third active ingredient along with the 2,4-D.

⁶ Use a separate identifier for the percentage strength of 2,4-D (% w/v) e.g. 62.5%, 68%, 70%, 72%, 80%. The commission may group certain categories of '% strength' in formulating a final MCC.

SECTION A

COMPANY AND SUPPLIER INFORMATION

TO BE COMPLETED BY THURSDAY 15 JANUARY 2026

A.1 Your company

1. Please nominate a contact person within your company:

Name	Jason Pitts
Position in the company	General Manager
Telephone	0408 504 436
E-mail address	jason@kenso.com.au

2. If you have appointed a representative, provide their contact details:

Name	Moulis Legal
Address	6/2 Brindabella Circuit Canberra International Airport Australian Capital Territory 2609
Telephone	+61 2 6163 1000
E-mail address	daniel.moulis@moulislegal.com

In nominating a representative, you are granting authority to the commission to discuss matters relating to the case with the nominated representative, including your company's confidential information.

3. Provide the address of where your company's importation, sales and financial records are held.

Level 1, 98, Commercial Road, Teneriffe, 4005 QLD

4. What is the legal name of your business and Australian Business Number?

Kenso Agcare Pty Ltd ACN 115 269 460

5. Does your company trade under a different name and/or brand? If yes, provide details.

No

6. Was your company ever known by a different legal and/or trading name? If yes, provide details.

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No

7. What is the overall nature of your company's business? Include details of the products that your company imports and sells.

The overall nature of Kenso Agcare's business is mainly the importation and distribution of agrochemical products. For details of the products Kenso Agcare imports and sells, see Attachment 1 – Products listing [CONFIDENTIAL].

8. Does your company undertake all functions of the importation of the goods, including lodging the import declarations, paying importation costs (e.g. duties, broker's fees, port charges), transportation from the port of discharge? If no, please provide details of the other company and the importation functions undertaken by that company.

Yes

9. What is the role of your company in the Australian market for the alleged circumvention goods? Include details of whether your company can be described as a trader, distributor, retailer or an end-user of the goods and/ or circumvention goods.

Kenso Agcare distributes a wide range of quality crop protection products for use in Australian farming systems.

10. Complete the worksheet named 'Part A - Supplier information' in the related supporting excel workbook. This worksheet lists your suppliers and manufacturers (if different), their contact details and an estimation of the import volumes from each supplier of the 2,4-D products sourced from all overseas suppliers between 1 January 2025 to 31 December 2025.

See Attachment 2 – Supplier information [CONFIDENTIAL].

11. Is your company part of a group (e.g. parent company with subsidiaries, common ownership, joint ventures)? If yes, provide:

- (a) A diagram showing the complete ownership structure
- (b) A list of all related companies and its functions
- (c) Clearly identify those entities in the group that are related suppliers or manufacturers

See the following Attachments:

- Attachment 3 – Ownership structure [CONFIDENTIAL]
- Attachment 4 – Related companies [CONFIDENTIAL]

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SECTION B

THE CIRCUMVENTION GOODS

TO BE COMPLETED BY WEDNESDAY 11 FEBRUARY 2026

B.1 Ordering process

1. When did you first commence importing the alleged circumvention goods (2,4-D) into Australia from Malaysia?

Kenso Corporation has been exporting formulated 2,4-D products to Australia since 2002. [CONFIDENTIAL TEXT DELETED – historical Kenso corporate information]

In 2005, Kenso Agcare Pty Ltd was incorporated. This corporate entity commenced importing formulated 2,4-D products from Kenso Corporation in 2006.⁷

2. Fully describe the ordering and purchase process from your overseas suppliers, from market offer through to invoicing, delivery and payment.

Kenso Corporation issues a sales price list to Kenso Agcare on a monthly basis. Kenso Agcare then places orders with Kenso Corporation, based on demand requirements and with a “goods required” date. Shipment delivery terms are [CONFIDENTIAL TEXT DELETED – commercial information], with Kenso Corporation issuing an invoice to Kenso Agcare as soon as the goods are shipped.

Kenso Agcare payments to Kenso Corporation range from [CONFIDENTIAL TEXT DELETED – number] days to [CONFIDENTIAL TEXT DELETED – number] days.

3. Are the alleged circumvention goods that you imported into Australia part of your supplier or suppliers’ standard product offering to Australia, or are they only available in special circumstances (e.g. through special order, to certain customers etc.)? Please provide details.

The goods are Kenso Corporation’s standard offering of formulated 2,4-D products to the Australian market.

4. Are the alleged circumvention goods purchased in accordance with a supply agreement or contract? If so, please provide a copy of this supply agreement/contract.

[CONFIDENTIAL TEXT DELETED – commercial information]. Order/invoice terms and conditions deal with the legal rights and obligations of the parties with respect to each order.

⁷ [CONFIDENTIAL TEXT DELETED – historical information about 2,4-D product from suppliers in other countries]

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5. Do you (or did you initially) specifically request the alleged circumvention goods from Malaysia or is the supply of 2,4-D from Malaysia determined by other parts of your organisation, such as at the parent company level?

As per our answer to question B.1.1, Kenso Corporation has been exporting formulated 2,4-D products to Australia since 2002. Presently, it is Kenso Agcare that places orders on Kenso Corporation. At all times orders have been based on seasonal demand and the order requirements of our Australian customers.

B.2 Purchase price

1. Is there a difference in purchase price between suppliers of 2,4-D from China (the goods subject to measures) and 2,4-D from Malaysia (the alleged circumvention goods), assuming all other factors of the sale were the same (e.g. order quantity, product characteristics, credit terms etc.) and taking into account any dumping duties payable? Provide details.

Kenso Agcare is affiliated with Kenso Corporation [CONFIDENTIAL TEXT DELETED – commercial information]. Kenso Agcare does not import 2,4-D products from China and has no visibility of prices of same.

B.3 Supplier relationships

1. Outline whether your supply of 2,4-D products from Malaysia is an exclusive arrangement or is your company permitted to source from other overseas suppliers of 2,4-D products from China or elsewhere?

Kenso Agcare's supply of 2,4-D products exported from Malaysia by Kenso Corporation is an exclusive arrangement with Kenso Corporation. [CONFIDENTIAL TEXT DELETED – commercial information]

2. Describe the circumstances that lead to your importation of 2,4-D products from Malaysia from 2019.

As per our answer to question B.1.1, Kenso Corporation has been exporting formulated 2,4-D products to Australia since 2002. Kenso Agcare was not "led" to continue to import formulated 2,4-D products from Malaysia in 2019 or at any other time by any circumstance other than the continuation of its business purpose in Australia.

3. Prior to sourcing 2,4-D product from Malaysia, were you sourcing 2,4-D products from China? If yes, for how long were you previously sourcing from China and what were the reasons driving the decision to change from a Chinese based source to a supplier in Malaysia? For instance, was there a change in Australian customer preferences, is the change related to arrangements within your own organisation, were other factors relevant, e.g. price, end use, quality, anti-dumping tariffs, or any other factors etc.

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No

B.4 End use applications

1. After importing the 2,4-D from Malaysia (**the alleged circumvention goods**), explain the subsequent sales and distribution channel within the Australian market. For example, do you on-sell the products to other Australian entities for their use/consumption, or for their further on-sale?

Kenso Agcare sells the formulated 2,4-D products it imports from Malaysia to distribution partners in Australia for further on-sale.

2. In general, are there any specific purpose(s) and/or end use(s) that the 2,4-D from Malaysia (**the alleged circumvention goods**) is suitable for that the 2,4-D from China is unsuitable for? Provide specific product details and supporting evidence where possible.

At the general level, the same *type* of 2,4-D product has the same specific purpose and end use no matter who produces it and where it comes from. With respect to specific purposes or end uses within the range of what are commonly known as 2,4-D products, technical 2,4-D acid is for the specific purpose and end use of formulation, whereas formulated 2,4-D acid has the specific purpose and end use of broad acre application.

Although not a difference in specific purpose or end use, formulations themselves can vary in their performance and marketability, within a range, based on their specific attributes. [CONFIDENTIAL TEXT DELETED – product information].

3. Are there any purpose(s) and/or end use(s) that the goods from China and the circumvention goods from Malaysia can be used interchangeably for?

Please refer to our answer to question B.4.2.

4. What standards/specifications are the goods and the alleged circumvention goods manufactured to? What are the relevant tolerances that apply to the manufacture of the products?

The goods are manufactured according to standards set by the Australian Pesticides and Veterinary Medicines Authority. Kenso Corporation's production facility is ISO 9001:2015 certified.

5. If you are importing both the goods and the alleged circumvention goods, explain why you are importing a mix of these products to Australia.

Not applicable

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6. If your company on-sells the circumvention goods to other parties within the Australian market, please refer to questions at sections B.5 and B.6 below.

Please refer to our answers to the questions in B.5 and B.6.

B.5 Selling price in the Australian market

1. Is there a difference in selling prices to your Australian customer(s) between the goods from China and the alleged circumvention goods from Malaysia, assuming all other factors of the sale were the same (e.g. order quantity, product characteristics, credit terms etc.) and taking into account any dumping duties payable? Provide details.

Kenso Agcare only sources 2,4-D products from Malaysia and exclusively from Kenso Corporation.

B.6 General questions

1. Did your company import 2,4-D products (**goods the subject of the anti-dumping notice**) from China in the period of from 1 January 2019 to 31 December 2025 for the purposes of supplying the Australian market with 2,4-D? If Yes, please list and describe these products.

Not applicable

2. Did your company import 2,4-D products (the circumvention goods) from Malaysia to supply the Australian market from 1 January 2019 to 31 December 2025? If Yes, please list and describe these products.

Product name	Product Description
[CONFIDENTIAL TEXT DELETED – sales information about products/product specifications available to Australian end-users]	

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3. Do you sell the alleged circumvention goods to your customer/s in the Australian market in accordance with a supply agreement or contract? If so, please provide a copy of this supply agreement/contract.

Kenso Agcare [CONFIDENTIAL TEXT DELETED – commercial information concerning distribution]. Copies of such trading agreements are to be found in Attachments 5, 6 and 7 [CONFIDENTIAL].

With respect to other customers, terms and conditions associated directly with an order/invoice deal with the legal rights and obligations of the parties with respect to each such order.

4. How is 2,4-D from China and 2,4-D from Malaysia marketed in the Australian market? In your response, address the following:

- (a) the applications and end uses that the goods and the alleged circumvention goods are marketed for
- (b) the type of customers (end users, retailers etc.) the marketing of the goods and the alleged circumvention goods is targeted at
- (c) the advertising and marketing costs incurred in respect of the goods and the alleged circumvention goods.

(a) At the general level, the same type of 2,4-D product has the same specific purpose and end use no matter who produces it and where it comes from. With respect to specific purposes or end uses within the range of what are commonly known as 2,4-D products, technical 2,4-D acid is for the specific purpose and end use of formulation, whereas formulated 2,4-D acid has the specific purpose and end use of broad acre application.

(b) Kenso Agcare's [CONFIDENTIAL TEXT DELETED – commercial information concerning sales].

(c) Advertising and marketing focusses on product performance and quality assurance. Formulations themselves can vary in their performance and marketability, within a range, based on their specific attributes. [CONFIDENTIAL TEXT DELETED – product information]. Kenso Corporation is also ISO 9001:2015 certified and will guarantee the quality of the products.

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SECTION C

IMPORTS & FORWARD ORDERS

TO BE COMPLETED BY WEDNESDAY 11 FEBRUARY 2026

Please complete this part after the commission has provided you with your detailed spreadsheets of imports

After receiving Part A of the questionnaire, the commission will provide you with a list of your 2,4-D import declarations from the Australian Border Force import database.

Within this spreadsheet, you will be required to identify all the circumvention goods imported from Malaysia. Please note that you cannot complete this part of the questionnaire until the Commission provides you with the list of your imports. The commission will provide this list to you after receiving your response to Part A of the questionnaire.

Please review this spreadsheet and confirm whether this is a complete listing of the importation of 2,4-D from Malaysia across the period **1 January 2019 to 31 December 2025** according to your company's records.

If the import listing provided does not include all your importations, or you have identified any other issues, please contact the case manager as soon as possible.

Please see Attachment 8 - Kenso Corp and Kenso Agcare – 2,4-D IQ spreadsheets [CONFIDENTIAL]. Note that Kenso has:

- (a) included a worksheet containing data for 2019 to 2021 (at tab *2019-2021 – Kenso data*) to report shipments in the earlier part of the inquiry period, [CONFIDENTIAL TEXT DELETED – information provided by Commission];
- (b) included a column in the data received from the Commission (at tab *2022-2025 – Check ABF data*) for “Remarks” (more precise description of product concerned) and “Comments” ([CONFIDENTIAL TEXT DELETED – information about product shipping practices]);
- (c) included a worksheet (at tab *2021-2024 – Missing data*) containing [CONFIDENTIAL TEXT DELETED – information provided by Commission].

C.1 Forward orders

1. Complete the worksheet named 'Part C - Forward Orders'. This worksheet lists your current forward orders of the goods. You must provide this list in electronic format using the template provided.

Please see Attachment 8 - Kenso Corp and Kenso Agcare – 2,4-D IQ spreadsheets [CONFIDENTIAL] at tab *Part C - Forward orders*.

SECTION D

AUSTRALIAN SALES OF 2,4-D IMPORTS

TO BE COMPLETED BY 11 FEBRUARY 2026

D.1 Sales

Please provide details of all your sales of 2,4-D, in the Australian market from **1 January 2025 to 31 December 2025**.

If possible, and where appropriate, the following data should be provided in Microsoft Excel format (a suggested spreadsheet Part D – Sales is provided within the “Importer Questionnaire Spreadsheets” workbook).

Please include:

- customer name
- customer level of trade (distributor, end user etc.)
- customer's location (state/territory, city)
- MCC code (*as per the structure outlined in this questionnaire on page 9*)
- invoice number
- invoice date
- delivery terms (e.g. free into store, ex-warehouse)
- payment terms (including number of days)
- product code
- product description
- quantity (including unit of quantity)
- packaging type
- total invoice value
- unit invoice price
- off invoice discount/rebate amount (if applicable, list each type of discount/rebate individually)
- net unit sales price
- your supplier of the goods
- purchase order number to supplier

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- country of origin.

Please see Attachment 8 - Kenso Corp and Kenso Agcare – 2,4-D IQ spreadsheets [CONFIDENTIAL], at tab *Part D – Sales*.

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LIST OF ATTACHMENTS

No.	Description	Confidential/non-confidential
1	Products listing*	CONFIDENTIAL
2	Supplier information*	CONFIDENTIAL
3	Ownership structure*	CONFIDENTIAL
4	Related companies*	CONFIDENTIAL
5	Trading Agreement - [CONFIDENTIAL TEXT DELETED – distributor information]	CONFIDENTIAL
6	Trading Agreement - [CONFIDENTIAL TEXT DELETED – distributor information]	CONFIDENTIAL
7	Trading Agreement - [CONFIDENTIAL TEXT DELETED – distributor information]	CONFIDENTIAL
8	Kenso Corp and Kenso Agcare – 2,4-D IQ spreadsheets	CONFIDENTIAL

* These Attachments were provided to the Commission at the time Kenso lodged its response to Part A of the Importer Questionnaire.