



## **Exporter Verification Report**

### **Verification & Case Details**

<b>Initiation Date</b>	12 July 2018	<b>ADN:</b>	2018/111
<b>Case:</b>	Aluminium Extrusions - Review of Measures - China		
<b>Case Number</b>	482		
<b>Exporter</b>	Tai Shan City Kam Kiu Aluminium Extrusion Co., Ltd.		
<b>Location</b>	CHINA		
<b>Review Period</b>	1 July 2017	<b>to</b>	30 June 2018

**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**

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## 1 BACKGROUND

### 1.1 Benchmark verification

The verification team assessed the information provided by Tai Shan City Kam Kiu Aluminium Extrusions Co., Ltd. (KAE) in its response to the exporter questionnaire (REQ), and the verification activities from previous reviews conducted by the Anti-Dumping Commission (the Commission). Based on this information, it is the verification team's view that it is suitable to conduct a benchmark verification with respect to aluminium extrusions exported by KAE to Australia from the People's Republic of China (China).

The benchmark verification involves comparing key variables to those of other exporters verified on-site and key variables from the most recent review of measures relevant to the exports of aluminium extrusions from China (REV 392). Key variables for comparison are costs, normal values, export prices, and any subsidy programs, and are used to assess reliability of the data provided by an exporter in its questionnaire.

Where benchmarking identifies results that are inconsistent with expectations, the verification team will escalate the level of verification and may consider a partial or full verification.

The verification team found that the resulting ascertained variable factors are consistent with expected values and can be considered reliable for the purposes of determining an interim dumping and subsidy margin.

Information about the outcome of verification visits to other exporters in this current review, and with respect to REV 392, can be found on relevant case page on the Commission's website: [www.adcommission.gov.au](http://www.adcommission.gov.au).

Details of the benchmark verification assessment is contained in **Confidential Attachment A**.

### 1.2 Corporate Structure and Ownership

Tai Shan City Kam Kiu Aluminium Extrusion Co., Ltd (KAE) is a limited liability company, wholly owned by a foreign entity-There are a number of related entities affiliated with KAE.

KAE produces a wide range of aluminium extrusions which are used in a variety of applications.

KAE sold aluminium extrusions, for the Australian market, to a foreign related entity, Kam Kiu Aluminium Products Sdn. Bhd. (KMY). During the review period the Kam Kiu Group underwent a restructure that resulted in aluminium extrusions being sold for the Australian market to a second foreign related entity, Kam Kiu (Hong Kong) Limited (KHK).

KMY was determined to be the importer of the goods for the purposes of the review investigation 392 (REV 392) on the basis that it was the beneficial owner of the goods at the time of importation. KAE, in its response to the exporter questionnaire (REQ), stated that the restructure did not result in a material change and that there is no 'fundamental difference' between the business models. An assessment of the data provided by KAE demonstrates that KMY and KHK both were the beneficial owners of the goods at the time of importation for the current review period. For this reason, the verification team considers both related foreign traders, KMY and KHK, to be the importers for the purposes of this current review.

A fourth related entity, Kam Kiu (Australia) Pty Ltd. (KAU), is involved in the sale of goods to Australia. This entity is an Australian company that facilitates sales to Australian end users.

### **1.3 Related Parties**

In REV 392, the verification team examined the relationships between related parties involved in the manufacture and sale of the goods. As was found in REV 392, a majority of sales between KAE and both its related parties, the importers, were found to be unprofitable and the aggregated profits and losses across all sales were found to be unprofitable. A finding such as this indicates that the importer will directly or indirectly be reimbursed, be compensated or otherwise receive a benefit for whole or any part of the prices. Therefore, for the purposes of this review the verification team will consider the related parties consistent with REV 392.

#### **1.3.1 Related Customers**

KAE states in its REQ that it sells the goods under consideration to related entities for export to Australia. KAE also stated in its REQ that it does not sell like goods in the domestic market to any related customers.

These statements are consistent with the findings in REV 392.

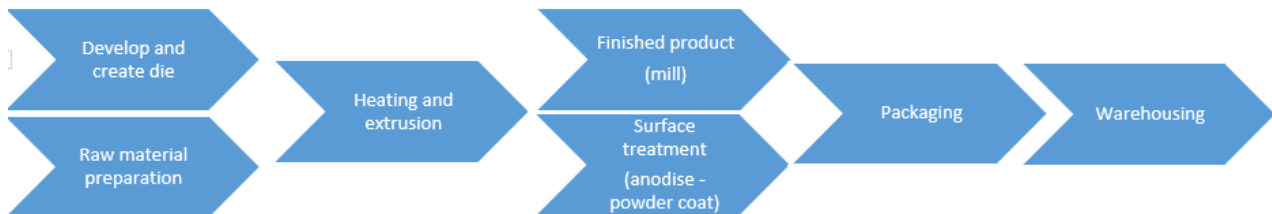
#### **1.3.2 Related Suppliers**

KAE claims in its REQ that it does not purchase materials from related parties. This is consistent with the findings in REV 392.

## 2 THE GOODS AND LIKE GOODS

### 2.1 Production Process

The verification team examined information on the production process provided by KAE in its REQ. The verification team considers that the production process for the goods follow the following basic process to transfer raw materials into finished goods of various finishes.



### 2.2 The goods exported to Australia

The verification team were satisfied that KAE produced and exported the goods to Australia. KAE exported the goods to Australia during the review period with the following finishes:

- Mill finish
- Anodised
- Powder coated
- Oil coated

### 2.3 Like goods sold on the domestic market

The verification team is satisfied that KAE sold like goods in the domestic market.

The verification team has considered submissions made by KAE with respect to like goods in REV 392. KAE claimed that the models it manufactures for use in the further production of transformed goods described as “high-end” models, should not be considered like goods.

In its assessment of this submission, the Commission accepted that the “high-end” models KAE sells domestically may differ from the normal models manufactured by KAE, including by way of alloy composition, appearance as described by size or shape, additional production and quality control processes applied during their manufacture, or specificity of commercial application. However, the Commission did not accept that the combination of these factors changes the fundamental nature of these models such that they are not like goods.

The verification team considers that these “high-end” models are properly categorised under the goods description as “aluminium extrusions that are parts intended for use in intermediate or finished products”.

## **2.4 Model matching**

The verification team is satisfied that, consistent with previous reviews and the original investigation,<sup>1</sup> that model matching should be completed on the basis of finish.

The verification team considers the categories used for model matching in REV 392 are relevant when comparing sales of domestic models and export models.

However, should a market situation determination be made (see section 7), the verification team notes that constructing normal values under subsection 269TAC(2)(c) does not require matching domestic models to export models.

## **2.5 Like goods – assessment**

Based on the information provided in KAE's REQ and consistent with the outcome of verification activities completed with respect to REV 392, the verification team considers that the goods produced by KAE for domestic sale have characteristics closely resembling those of the goods exported to Australia and are therefore 'like goods' in accordance with subsection 269T(1).

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<sup>1</sup> Australian Customs Dumping Notice No. 2010/40 found on the Commission's website ([www.adcommission.gov.au](http://www.adcommission.gov.au)) refers.

## 3 EXPORT PRICE

### 3.1 The importers

In relation to aluminium extrusions exported to Australia by KAE, the Commission, in REV 392, considered that the related entity, KMY, was the beneficial owner of the goods at the time of importation, and therefore was the importer of the goods.

In its REQ, KAE stated that, due to an internal restructure during the review period, KAE began exporting to a different related entity KHK

Therefore, with respect to this review (REV 482), the verification team considers both related entities, KMY and KHK, to be the importer of the goods during the relevant periods. Analysis of the data provided by KAE supports this consideration.

### 3.2 The exporter

The Commission generally identifies the exporter as a principal in the transaction, located in the country of export from where the goods were shipped, that gave up responsibility by knowingly placing the goods in the hands of a carrier, courier, forwarding company, or its own vehicle for delivery to Australia; or a principal in the transaction, located in the country of export, that owns, or previously owned, the goods but need not be the owner at the time the goods were shipped.

The verification team are satisfied that KAE is the exporter of the goods for all Australian export sales during the review period.

### 3.3 Arm's length

Section 269TAA of the Act outlines the circumstances in which the price paid or payable shall not be treated as arm's length, being:

- there is any consideration payable for, or in respect of, the goods other than its 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, is directly or indirectly reimbursed, compensated or otherwise receive a benefit for, or in respect of, the whole or any part of the price.<sup>2</sup>

During the verification of KAE's data for REV 392, the verification team found that the price was influenced by a commercial, or other relationship, between KAE and KMY. The verification team relied on information about KAE's selling arrangements and information obtained during the importer visit to KAU. During the review period relevant to REV 392, the verification team also established that the majority of shipments imported were unprofitable.

In the analysis of data provided by KAE for the current review period, the verification team were able to demonstrate that a large proportion of export sales between KAE and both KMY and KHK were also unprofitable. The verification team considers that sales between the exporter and importer of the goods during the current review period were not at arm's length on the basis of:

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<sup>2</sup> Section 269TAA of the Act refers.

findings from Rev 392;

- the statements made by KAE in its REQ; and
- the analysis of data provided for this review.

### **3.4 Export Price – assessment**

Consistent with the outcome of REV 392, the verification team consider that:

- the goods have been purchased by the importer from the exporter;
- the transactions between the importer and the exporter was not at arm's length; and
- the goods were subsequently sold by the importer in the same condition to customers in arms length transactions.

The verification team consider that the export price can be calculated in accordance with subsection 296TAB(1)(b) of the Act. Specifically, the team consider that the export price can be calculated by reference to the invoice prices from KMY to the Australian customer, less the prescribed deductions.

The verification team's preliminary export price calculations are contained in **Confidential Appendix 1**.



## 4 COST TO MAKE AND SELL

### 4.1 Related party purchases

With respect to REV 392, the verification team found that KAE did not purchase any major raw materials from related parties, during the relevant review period. In its REQ for this review, KAE did not further disclose that it purchased any major raw materials from related parties during the current review period.

### 4.2 Cost to make and sell summary

The verification team completed a benchmark exercise of the cost to make and sell (CTMS) data during the current review period and found that the results were as expected and in line with the CTMS findings of Rev 392, with the exception of one model. The verification team requested further information with respect to this particular model and conducted further analysis of this model. The verification team are satisfied that the type of model is likely to have higher CTMS than that of other finishes, based on the additional information provided by KAE.

The verification team found that the high CTMS for this model did not materially change<sup>3</sup> the preliminary dumping margin calculation and therefore assess the high values for this model as low risk. The verification team did highlight that this may change in future reviews and should be considered in greater detail should export volumes of this model increase.

The verification team's preliminary CTMS calculations are contained in **Confidential Appendix 2**.

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<sup>3</sup> The verification team analysed the impact of the high cost model and found that the difference calculated for a preliminary dumping margin change in magnitude by 0.1 per cent.

## **5 DOMESTIC SALES SUITABILITY**

The verification team has assessed the domestic sales made by KAE to determine if the prices paid in respect of domestic sales of like goods are suitable for assessing normal value under subsection 269TAC(1).

### **5.1 Arm’s length**

In respect of domestic sales of the goods made by KAE to its customers during the review period, the verification team found no evidence demonstrating that:

- there was any consideration payable for, or in respect of, the goods other than its price; or
- the price was 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, was not directly or indirectly reimbursed, compensated or otherwise received a benefit for, or in respect of, the whole or any part of the price.

This is consistent with the findings of REV 392. The verification team therefore considers that all domestic sales made by KAE during the period were arm’s length transactions.

### **5.2 Ordinary course of trade**

Section 269TAAD 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, then they are taken not to have been sold in the ordinary course of trade (OCOT).

The verification team have compared the revenue (i.e. net sales value) for each domestic sale of like goods to the corresponding quarterly domestic CTMS to test whether those sales were profitable. Where the volume of unprofitable sales exceeded 20 per cent for a particular model, the verification team tested the recoverability of the unprofitable sales by comparing the revenue for each transaction to the corresponding weighted average CTMS over the review period. Those sales found to be unrecoverable were considered not to be in OCOT.

The results of the verification teams testing of the ordinary course of trade are as follows:

Number of Models	Number of Models with Sales in OCOT
4	4

### **5.3 Suitability of domestic sales**

Subparagraph 269TAC(2)(a)(i) provides that the normal value of goods exported to Australia cannot be ascertained under subsection 269TAC(1) where there is an absence, or low volume, of sales of like goods in the market of the country of export. Low volume is defined by subsection 269TAC(14) as less than 5 percent of the total volume of the goods under consideration that are exported to Australia.

There were a small number of models where the verification team found that there are no domestic sales suitable for ascertaining a normal value under subsection 269TAC(1). However, due to market situation claims, normal values are likely be constructed pursuant to subsection 269TAC(2)(c) of the Act, using costs to make the goods exported to Australia, plus SG&A applicable to the goods sold domestically, and an additional amount for profit.

## **5.4 Profit**

Where the Commission is required to calculate a normal value under section 269TAC(2)(c), an amount of profit must be determined. In a submission made by KAE in response to the Statement of Essential Facts for REV 392 (SEF 392), it asserted that:

*High-end models are:*

- (a) materially different in that they are often made with different grade alloys compared to the alloys used to manufacture normal modes;*
- (b) different in outward appearance by way of the smaller lengths to which they are cut, when compared to the multiple metre long lengths that normal model aluminium extrusions are cut to;*
- (c) also different in outward appearance by way of the different , and sometimes detailed, finishes applied to them;*
- (d) also different in outward appearance by way of other additional production process that are applied to them, such as frilling, CNC milling and bending;*
- (e) characteristically different to the normal models due to the tighter tolerances to which they are build and the additional quality control inspections that they are subjected to, that is, the high-end models that make it to sale are more consistent and accurate t specification than normal models; and*
- (f) made especially for and used in specific commercial applications, namely, in the production of mobile phones, in the production of sunroofs for motor vehicles and in the production of medical equipment, whereas normal models are used a broad range of applications, including window frames, door frames et cetera.*

Further, KAE had claimed that the models it manufactures for use in transformed goods described as “high-end” models, should not be considered like goods for the purposes of calculating an amount of profit.

In SEF 392, the Commission outlined its assessment of KAE’s claims and accepted that high-end models that KAE sells domestically may differ from the models manufactured by KAE for export to Australia. However, the Commission did not accept that the high-end models were not like goods.

The Commission did, however, accept that the profits derived from the domestic sales of the high-end models should be excluded from the calculation of profit for the purpose of constructing a normal value, ensuring a fair comparison is made between the export price of the goods under consideration and the normal value of those goods.

After consideration, it is the verification team’s view that excluding the profit of any like goods sold in the ordinary course of trade on the domestic market in the profit calculation used for the construction of normal value is inconsistent with section 45 of the *Customs (International Obligations) Regulation 2015* (the Regulations).

For this reason, the verification team have departed from the methodology used in REV 392 and have not excluded the high-end models from the profit calculation for the purposes of REV 482.

## **5.5 Domestic sales summary**

The verification team considers that domestic sales during the review period can be used for assessing profitability of sales in OCOT for the purposes of constructing a normal value in accordance with subsection 269TAC(2)(c).

The domestic sales listing, ordinary course of trade test and profitability calculation are contained in **Confidential Appendix 3**.

## 6 ADJUSTMENTS

To ensure the normal value is comparable to the export price of goods exported to Australia at free-on-board (FOB) terms, the verification team has considered the following adjustments in accordance with subsection 269TAC(8).

### 6.1 Rationale and Methodology

Adjustment Type	Rationale for Adjustment	Calculation Methodology	Evidence <sup>4</sup>	Claimed in REQ?
<b>Credit Terms</b>	<p>The verification team considers that a downward adjustment to the normal value for domestic credit is necessary to ensure a fair comparison to the FOB export price.</p> <p>The verification team considers that an upwards adjustment to the normal value for export credit KAE and KMY is necessary to ensure a fair comparison to the FOB export price.</p>	<p>The credit adjustments in REV 392 were calculated from the accounts payable turnover ratio for domestic customers and export sales to the related importer. As these calculations were verified on-site for the purposes of REV 392, and not on-site for the purpose of this current review, the verification team utilised the verified calculated averages.</p>	N/A	<b>Yes - Domestic</b>
<b>Inland Transport &amp; handling</b>	<p>Domestic inland transportation costs were excluded by KAE in its REQ with respect to its domestic the selling expenses. Therefore the verification team considered the construction of normal value to commence at an Ex-work domestic sale level, requiring no downward adjustment.</p> <p>The verification team considers an upward adjust for export inland transport and handling expenses is required to ensure a fair comparison to the FOB export price.</p>	<p>The verification team has applied the upward adjustment on the inland transport and handling costs listed on a weighted average basis.</p>	N/A	<b>Yes</b>

<sup>4</sup> Evidence was not requested. The verification team conducted benchmark analysis of information provided by KAE. Further evidence or clarification is only requested where the benchmark results are inconsistent with expected results.

**PUBLIC RECORD**

<p><b>Domestic Quality Issue Discount</b></p>	<p>KAE provided information relating to invoice discounts that are applied to domestic sales as compensation for quality issues. This is consistent with adjustments made relevant to REV 392.  The verification team consider a downward adjustment is required to ensure a fair comparison to FOB export price.</p>	<p>The verification team has applied this adjustment based on the discount applied to relevant transactions.</p>	<p><b>N/A</b></p>	<p><b>Yes</b></p>
<p><b>Packaging</b></p>	<p>KAE stated in its REQ that there is no difference in packaging costs between domestic and export sales.  The verification team conducting the on-site verification as part of REV 392 found that there was a difference in packaging insofar as trolleys were used to load the goods into containers for export to Australia.  The verification team consider, relevant to this review, that an upward adjustment for export trolley cost is required to ensure a fair comparison to the FOB export price.</p>	<p>KAE did not provide separate costs relevant to the trolleys used for export sales. The verification team considered the verified trolley cost calculated in REV 392 to be a suitable substitute for the purposes of REV 482.</p>	<p><b>N/A</b></p>	<p><b>No</b></p>

## PUBLIC RECORD

### 6.2 Adjustments

Adjustment Type	Deduction/addition
Domestic credit	Deduction
Domestic quality issue discount	Deduction
Export credit	Addition
Export inland transport & handling	Addition
Export packaging	Addition
Non Refundable VAT	Addition

The verification team's preliminary adjustment calculations are to be included in normal value calculations at **Confidential Appendix 4**.

## 7 NORMAL VALUE

The previous review, REV 392, found that the situation in the market of the country of export was such that sales in that market were not suitable for use in determining a price under subsection 269TAC(1).

Further, in relation to that review, the Commission did not consider that the records of the Chinese exporters of aluminium extrusions reasonably reflected competitive market costs associated with the production of those goods, for the purposes of section 43 of the Regulations.

The case team will be review these findings and determinations in preparing the statement of essential facts (SEF). The case team will determine normal values at that time. As such, the verification team has not determined normal values.

However, for the purposes of the benchmark analysis, the verification team has constructed the normal value according to subsection 269TAC(2)(c) of the Act, using KAE's:

- cost to make the goods exported to Australia; plus
- SG & A amounts on the assumption that the goods, instead of being exported, were sold domestically.

As discussed in section 6.4, a rate of profit has been determined using KAE's domestic sales of like goods in the ordinary course of trade.

The verification team's preliminary normal value calculations used in the benchmark analysis are contained in **Confidential Appendix 4**.

## **8 DUMPING MARGIN**

The verification team has referred the determination of the normal value to the case management team. Therefore, the verification team has not calculated a preliminary dumping margin in respect of the goods exported to Australia by KAE for the review period.

Dumping margins will be determined and detailed in the SEF.



## 9 SUBSIDIES

### 9.1 Preferential tax programs

In its REQ, KAE advised that it received benefits under programs 47 and 48 during the review period.

#### 9.1.1 Program 47

KAE advised that to be eligible to a reduced tax rate under program 47 a company should be recognised as a high and new technological enterprise. KAE advised that the benefits it received under this program were not applicable to the products exported to Australia. KAE submitted that the benefits it received under this program should not be included in the subsidy calculations.

The statements made by KAE in its REQ are consistent with those made relevant to REV 392. During the on-site visit during REV 392 KAE were able to provide relevant documents supporting the calculation of the benefit received in relation to this reduced tax rate.

The verification team in REV 392 noted that this program benefited all production of KAE. The verification team in the current review have not departed from this finding.

#### 9.1.2 Program 48

Similarly, KAE advised that to be eligible to receive the income tax offsets for R&D expenditure under program 48 they are required to meet certain eligibility criteria. As in REV 392, KAE advised neither the products nor activities for which these income tax offsets were relevant to the product types KAE exported to Australia. KAE again submitted that the benefits it received under this program should not be included in the subsidy calculations.

As with program 47, KAE provided relevant documents supporting the calculations made in REV 392 in relation to this income tax offset.

The verification team in REV 392 noted that this program benefited all production of KAE. The verification team in the current review have not departed from this finding.

### 9.2 Grants and preferential policies (Programs 2 to 9, 26, 29, 32, 35, 56 and 58 to 71)

In its REQ for the current review KAE declared that it did receive benefits under a number of the grants listed in the exporter questionnaire. KAE claims that there is no indication of the specificity of the subsidies relevant to programs 61 to 71 which were found to be countervailable in REV 392.

However, as it did in its REQ for REV 392, KAE identified and listed all other grants it benefited from during the current review period. KAE advised that, by providing this list, it did not concede that these grant payments were countervailable.

The verification team requested and received a copy of KAE's non-operating income ledger and found no evidence of KAE benefiting from other grants or preferential policies other than that disclosed in its REQ.

### **9.3 Aluminium provided by government at less than adequate remuneration (Program 15)**

In its REQ, KAE provided a spreadsheet listing all its purchases of primary aluminium during the review period. The verification team conducted analysis of aluminium purchases, benchmarking the results to other verified exporters' purchases during the current review period, and to that of KAE's verified aluminium purchases in REV 392.

The verification team considers the listing provided by KAE can be relied on for the purposes of calculating a subsidy margin.

### **9.4 Tariff and VAT exemptions on imported materials and equipment (Program 21)**

KAE provided an asset schedule summary relating to benefits received under program 21. KAE identified a select number of assets not yet installed to use in production, advising that these assets should not be included in any calculation of benefit under this program.

In REV 392, the on-site verification found the data provided by KAE to be accurate and complete, and that the equipment that was non-operational during that review period were not depreciated during that period.

For the purposes of the benchmark exercise for REV 482, the verification team is satisfied that the asses schedule provided by KAE is reliable and can be used in calculating a subsidy margin.

### **9.5 Subsidies Preliminary Findings**

The verification team's calculation of a preliminary subsidy margin are found in **Confidential Appendix 5**.

## **10 APPENDICES AND ATTACHMENTS**

<b>Confidential Appendix 1</b>	Export price
<b>Confidential Appendix 2</b>	Cost to make and sell
<b>Confidential Appendix 3</b>	Domestic sales
<b>Confidential Appendix 4</b>	Normal value
<b>Confidential Appendix 5</b>	Subsidy calculations
<b>Confidential Attachment 1</b>	Benchmark verification assessment