



Australian Government
Department of Industry,
Innovation and Science

Anti-Dumping
Commission

Exporter Questionnaire



PT CG Power Systems Indonesia

Case number: Continuation Inquiry 504

Product: Power Transformers

From: The Republic of Indonesia, Taiwan and the Kingdom of Thailand

Inquiry period: 1 January 2016 to 31 December 2018 (the period)

Response due by: Part A: Due 20 March 2019
Parts B to H: **Extended to 1 April 2019**

Case manager: Reuben McGovern

Phone: +61 3 8539 2437

Return completed questionnaire to: investigations3@adcommission.gov.au

Anti-Dumping 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 inquiry into whether the continuation of anti-dumping measures, in the form of a dumping duty notice, in respect of power transformers (the goods) exported to Australia from the Republic of Indonesia (Indonesia), Taiwan and the Kingdom of Thailand (Thailand) is justified.

The Commission will use the information you provide to determine normal values and export prices over the inquiry period (the period). This information will determine whether power transformers have been dumped.

If you do not manufacture the goods

If you play a role in the export of the goods but do not produce or manufacture the goods (for example, you are a trading company, broker, or vendor dealing in the goods), it is important that you forward a copy of this questionnaire to the relevant manufacturers and inform the case manager of the contact details for these manufacturers **immediately**.

The Commission will still require your company to complete this exporter questionnaire except Section G – Cost to make and sell.

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 of the information sought, do not provide information within a reasonable time period, or do not allow the Commission to verify the information, we may deem your company to be an uncooperative exporter. In that case the Commission must determine a dumping margin having regard to all relevant information.

Therefore, it is in your interest to provide a complete and accurate response to this exporter questionnaire, capable of verification.

Extension requests

If you require a longer period to complete your response to this exporter questionnaire, you must submit a request to the case manager, 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.

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;
- previous correspondence and previous dealings with your company; and
- 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.

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A summary of any requests and grants of extensions to submit a response to this exporter questionnaire will be published in the public record.

Submitting a response to the exporter questionnaire

Responses to the exporter questionnaire should be lodged by email listed on the cover page. In submitting the response to the exporter questionnaire, you must answer all questions, include all attachments and spreadsheets, and provide a non-confidential version of your response to this exporter questionnaire.

If your response to this exporter questionnaire contains major deficiencies that, in the Commissioner's view, cannot be quickly and easily rectified in a further response, then your company may be deemed as an uncooperative exporter.

Confidential and non-confidential responses

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 exporter 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 non-confidential version of your submission 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 submissions are required to have a bracketed explanation of deleted or blacked out information for the non-confidential version of the submission. 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 exporter 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 wish to conduct a visit to your company to verify your questionnaire response for completeness, relevance and accuracy of the information to your company's records.

The verification visit is not meant to be a chance for you to provide new or additional information. The Commission expects your response to the questionnaire to be relevant, complete and accurate.

Any verification visit typically commences approximately 2 to 4 weeks after the due date of the response to the exporter questionnaire. To assist with planning of a verification visit, please contact the case manager as soon as possible for a potential verification date to be scheduled.

Verification is usually conducted over 4 days. However, in complex cases, a verification visit may be scheduled over 5 days. A verification visit will include a detailed examination of your company's records and we will collect copies of relevant documents. The verification will require the participation of key staff, including your financial accountant, production manager and sales staff. A tour of the manufacturing facility may also be required during the verification visit.

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Note that the Commission may disregard any data or information that is not verified, including new or additional information provided after the verification visit.

A report will be prepared following the verification visit, which details the outcomes of the visit. This report will be placed on the public record and may include the publication of the preliminarily-assessed dumping margin. The Commission considers that the dumping margin is not confidential information, but rather an aggregate figure derived from confidential data.

You will be provided with an opportunity to comment on the accuracy and confidentiality of the verification report prior to its publication on the public record.

The Commission may elect to undertake an alternative verification methodology than an on-site verification to satisfy itself of the completeness, relevance and accuracy of the data.

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 exporter 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.
- Clearly identify all units of measurement (e.g. KG) and currencies (e.g. AUD) used. Apply the same 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 A-5.6)
- 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 case officer as soon as possible.
- Where possible, electronic data should be emailed or shared with the Commission via SIGBOX, a secure online document repository. Please contact the case manager to request access to SIGBOX if required.

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CHECKLIST

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please tick if you have responded to all questions
Section A Company information	Provided 20 March
Section B Export sales to Australia	<input checked="" type="checkbox"/>
Section C Exported goods & like goods	<input checked="" type="checkbox"/>
Section D Domestic sales	<input checked="" type="checkbox"/>
Section E Due allowance	<input checked="" type="checkbox"/>
Section F Third country sales	<input checked="" type="checkbox"/>
Section G Cost to make and sell	<input checked="" type="checkbox"/>
Exporter's declaration	<input checked="" type="checkbox"/>
Non-confidential version of this response	<input checked="" type="checkbox"/>

Attachments	Please tick if you have provided spreadsheet
B-2 Australian sales	<input checked="" type="checkbox"/>
B-4 Upwards sales	<input checked="" type="checkbox"/>
B-5 Upwards selling expenses	<input checked="" type="checkbox"/>
D-2 Domestic sales	<input checked="" type="checkbox"/>
F-2 Third country sales	<input checked="" type="checkbox"/>
G-3 Domestic CTMS	<input checked="" type="checkbox"/>
G-4.1 SG&A listing	<input checked="" type="checkbox"/>
G-4.2 Dom SG&A calculation	<input checked="" type="checkbox"/>
G-5 Australian CTMS	<input checked="" type="checkbox"/>

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G-7.1 List of raw materials	<input checked="" type="checkbox"/>
G-7.4 Raw material purchases	<input checked="" type="checkbox"/>
G-8 Upwards costs	<input checked="" type="checkbox"/>
G-9 Capacity Utilisation	<input checked="" type="checkbox"/>

GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES

The goods under consideration (the goods) i.e. the goods exported to Australia, subject to anti-dumping measures, are:

Liquid dielectric power transformers with power ratings of equal to or greater than 10 MVA (mega volt amperes) and a voltage rating of less than 500kV (kilo volts) whether assembled or unassembled, complete or incomplete.

Incomplete transformers are sub-assemblies consisting of the active part and any other parts attached to, imported with or invoiced with the active parts of power transformers. The active part of a power transformer consists of one or more of the following when attached to or otherwise assembled with one another:

- the steel core;
- the windings;
- electrical insulation between the windings; and
- the mechanical frame.

The product definition includes step-up transformers, step-down transformers, autotransformers, interconnection transformers, voltage regulator transformers, rectifier transformers, traction transformers, trackside transformers and power rectifier transformers.

Distribution transformers are not the subject to the measures.

SECTION B EXPORT SALES TO AUSTRALIA

CGP did not export any power transformers to Australia during the period.

B-1 Australian export sales process

1. Provide details (and diagrams if appropriate) of the export sales process of your company and any entities (e.g. agents) including:

- (a) Marketing and advertising activities

CGP shut down its Australian sales office in 2016. CGP maintains a residential engineer in Australia who undertakes marketing activities on behalf of CGP, attends to servicing of CGP transformers that were installed prior to the imposition of measures and monitors opportunities for sales of spare parts and other CGP product within the market. CGP also maintains residential engineers in the [CONFIDENTIAL INFORMATION DELETED – markets].

In [CONFIDENTIAL INFORMATION DELETED – market], CGP operates a full-fledged sales and services office which actively solicits orders from prospective customers and is also involved in the end to end process of marketing, sales and post-sales activities.

- (b) Price determination and/or negotiation process

Theoretically, this would occur through a tender process. CGP's Indonesian staff would be responsible for completing the tender if any such opportunity was to arise.

The usual process for tenders is that CGP would cost a design that meets the tender requirements. Costs of a model can be determined with a good degree of accuracy because each design specifies all raw material required to complete the transformer.

CGP's intent when entering a bid is to make a profit. Management and the sales team will use the cost information from the design to determine what price they can offer to achieve a margin in line with CGP's KPIs. This would usually be around [CONFIDENTIAL INFORMATION DELETED – number].

In the past, some Australian customers have awarded long-term supply agreements with suppliers. These typically have a term of 5 years. The prices are determined through negotiation and are specified in the contract, which includes [CONFIDENTIAL INFORMATION DELETED – contract provisions]. Again, CGP will not enter into such an agreement at an unprofitable price.

- (c) Order placement process

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Customer would likely place a sales order with CGP at the time they wished to exercise their rights under any pre-existing agreement.

(d) Order fulfilment process and lead time

At the time CGP receives a sales order, it will check its stock for common raw materials (i.e. copper) required to complete the order and procure the remainder of the raw materials. Lead times are approximately [CONFIDENTIAL INFORMATION DELETED- period] months.

(e) Delivery terms and process

Delivery terms would depend on the incoterms specified in the underlying contract with the customer.

(f) Invoicing process

The invoicing process would be specified in the agreement with the customer.

(g) Payment terms and process

Payment terms would be specified in the agreement with the customer.

2. In what currency do you invoice your Australian customers? If it is not in your local currency:

(a) Do your customers pay you into a foreign currency denominated account? If yes, provide details;

Again, the currency of any transaction would likely be specified in a contract that sets out the terms of sale. Historically, Australian customers preference has been to pay in AUD.

(b) Do you use forward contracts to lock in the foreign exchange rate relating to the export sales? If yes, provide details;

[CONFIDENTIAL INFORMATION DELETED – details of CG finances]

(c) How is the exchange rate determined and how often is it updated in your accounting system?

SAP updates the exchange rate on a daily basis.

3. Are there any Australian customers related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.

CGP does not have any related customers in the Australian market.

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4. If sales are in accordance with price lists or price extras list, provide copies of these lists.

As already noted, all sales are made subject to contracts with the customer that specify the price of the individual power transformer.

5. Do your export selling prices vary according to the distribution channel identified? If yes, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

Not applicable. CGP did not have different distribution channels during the period.

6. Did you provide on-invoice discounts and/or off-invoice rebates to any Australian customer or an associate of the customer in relation to the sale of the goods during the period? If yes, provide a description and explain the terms and conditions that must be met by the customer to obtain the discount.

Not applicable. CGP did not provide any on-invoice discounts or off-invoice rebates to any Australian customer or to an associate of an Australian customer during the period.

7. Did you issue any credit or debit notes (directly or indirectly) to the customer or associate of the customer in relation to the sale of the goods during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.

Not applicable. CGP did not issue any credit or debit notes to any Australian customers or associates of Australian customers during the period.

8. The invoice date will normally be taken to be the date of sale. If you are making a claim that a different date should be taken as the date of sale:

- (a) What date are you claiming as the date of sale?
(b) Why does this date best reflect the material terms of sale?

Typically, the material terms of the sale will be crystallized at the point that a sales order is received. [CONFIDENTIAL INFORMATION DELETED – contract terms]. Accordingly, this is when the price is finalized.

We say “typically”, because each contract is different, and so may contain provisions to different effect.

[CONFIDENTIAL INFORMATION DELETED – accounting practice]

B-2 Australian sales listing

1. Complete the worksheet named “B-2 Australian sales”

- This worksheet lists all export sales (i.e. transaction by transaction) to Australia of the goods invoiced within the period.

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- Where a contract has been won during the investigation period but the goods are not yet shipped, provide details of these goods with any expenses incurred to date and the scheduled delivery date specified in the contract.
- If you have claimed in B-1.8 that the date of sale is one other than the invoice date, then add the sales within your claimed date of sale.
- You must provide this list in electronic format using the template provided.
- If you have used formulas to complete this worksheet, these formulas must be retained.
- If there are any direct selling expenses incurred in respect of the exports to Australia not listed in the spreadsheet, add a column. For example, if the delivery terms make you responsible for arrival of the goods at an agreed point within Australia (e.g. delivered duty paid), insert additional columns in the spreadsheet for all other costs incurred.

During the period CGP did not export the goods to Australia, nor did it win any contracts that will lead to the exportation of the goods to Australia in the future.

However, CGP has a legacy contract with [CONFIDENTIAL INFORMATION DELETED – customer] which dates back to [CONFIDENTIAL INFORMATION DELETED – date]. On [CONFIDENTIAL INFORMATION DELETED – date], [CONFIDENTIAL INFORMATION DELETED – customer] issued a sales order for [CONFIDENTIAL INFORMATION DELETED – product] under this contract. [CONFIDENTIAL INFORMATION DELETED – timeframe].

Please find attached a copy of the Australian Sales spreadsheet with what information CGP currently has regarding this pending exportation. (Confidential Attachment B-2). Please note that for the purpose of reconciliation, [CONFIDENTIAL INFORMATION DELETED – accounting practices].

2. Provide a table listing the source of the data for each column in the export sales listing (B-2.1).

The data reported in Confidential Attachment B-2 was extracted from the sales order. The relevant sales order is attached (Confidential Attachment B-2.2).

B-3 Sample export documents

1. Select the two largest invoices by value and provide the following documentation:
 - Contracts
 - Purchase order and order confirmation
 - Commercial invoice and packing list
 - Proof of payment and accounts receivable ledger
 - Documents showing bank charges
 - Invoices for inland transport
 - Invoices for port handling and other export charges
 - Bill of lading
 - Invoices for ocean freight & marine insurance (if applicable)
 - Country of origin certificates (if applicable)

If the documents are not in English, please provide a translation of the documents.

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2. For each document, please annotate the documents or provide a table reconciling the details in the export listing (in B-2) to the source documents (in B-3.1).

In addition to Confidential Attachment B-2.2, please refer to [CONFIDENTIAL INFORMATION DELETED – attachments]

B-4 Reconciliation of sales to financial accounts

1. Please complete the worksheet named “B-4 Upwards sales” to demonstrate that the sales listing in B-2, D-2 and F-2 are complete.
 - You must provide this list in electronic format using the template provided.
 - Please use the currency that your accounts are kept in.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
2. Please provide all documents (e.g. general ledgers, trial balances), other than those in A-5, B-2 and D-2, required to complete the “Upwards sales” worksheet. If the documents include spreadsheets, all formulas used must be retained.
3. For any amount in the “Upwards sales” worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
 - the name of the source document, including the relevant page number, in column F of the worksheet; and
 - highlight or annotate the amount shown in the source document.

Please refer to Confidential Attachment “B-4 Upwards sales”. Please note our comment with regard to the Australian sales spreadsheet at B-2 above.

B-5 Reconciliation of direct selling expenses to financial accounts

1. Please complete the worksheet named “B-5 Upwards selling expense” to demonstrate that the direct selling expenses (e.g. Inland transport) in B-2 and D-2 are complete.
 - You must provide this list in electronic format using the template provided.
 - Please use the currency that your accounts are kept in.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
2. Please provide all documents (e.g. general ledgers, trial balances), other than those in A-5, B-2 and D-2, required to complete the “Upwards SG&A” worksheet. If the documents include spreadsheets, all formulas used must be retained.
3. For any amount in the “Upwards sales” worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
 - the name of the source document, including the relevant page number, in column F of the worksheet; and
 - highlight or annotate the amount shown in the source document.

Please refer to Confidential Attachment B-5 - Upwards selling expenses.

SECTION C EXPORTED GOODS & LIKE GOODS

C-1 Models exported to Australia

1. Fully describe all of the goods your company exported to Australia during the period. Include specification details and any technical and illustrative material that may be helpful in identifying, or classifying, the goods exported to Australia.

During the period, CG did not export any power transformer to Australia.

As discussed in Section B, CG will be exporting a power transformer to Australia in [CONFIDENTIAL INFORMATION DELETED – period].
[CONFIDENTIAL INFORMATION DELETED – specifications].

2. List each unique unit of goods exported to Australia (these types should cover all types listed in spreadsheet “B-2 Australian sales” – see section B of this questionnaire).

EXPORT TYPE	Mega	Kilo volts (kV)
Product code of each unique unit of the goods exported to Australia	[CONFIDENTIAL INFORMATION DELETED – mega]	[CONFIDENTIAL INFORMATION DELETED – kV]

C-2 Models sold in the domestic market

1. Fully describe all like goods your company sold on the domestic market during the period. Include specification details and any technical and illustrative material that may be helpful in identifying, or classifying, the like goods sold on the domestic market.

Please refer to Confidential Attachment C-2 – Models sold in the domestic market.

2. List each unique unit of power transformer sold on the domestic market during the investigation period.

Please refer to Confidential Attachment C-2 – Models sold in the domestic market.

3. Please provide any technical and illustrative material that may be helpful in identifying or classifying the goods that your company sells on the domestic market.

Because each power transformer design is bespoke to the requirements of a customer or potential customer, CGP does not produce any document meeting the above description.

SECTION D DOMESTIC SALES

D-1 Domestic sales process

1. Provide details (and diagrams if appropriate) of the domestic sales process of your company and any other related entities including:

- (a) Marketing and advertising activities

The domestic market is of significant importance to CGP. [CONFIDENTIAL INFORMATION DELETED – percentage] of CGP’s sales are made to the domestic market. These sales are made to [CONFIDENTIAL INFORMATION DELETED – customers]. As a result, the domestic market is the focus of most after-sales and marketing activities. CGP has a dedicated sales team for [CONFIDENTIAL INFORMATION DELETED – customers], a full-fledged after sales team, and participate in many market-building activities – exhibitions, technical seminars, sales conferences and the like

The market in Indonesia will continue to grow in the medium term. The government has a 19 GW project for electrification out of which only about 5 GW has so far been realized. CGP will continue to have substantial capacity booked to satisfy this demand into the future.

- (b) Price determination and/or negotiation process

[CONFIDENTIAL INFORMATION DELETED – customer] has instituted a process called “open book” which is run by a consulting firm ([CONFIDENTIAL INFORMATION DELETED – firm]). The consulting firm studies costs (including material) of each qualified local manufacturer as well as the market pricing for raw materials. Based on this analysis, [CONFIDENTIAL INFORMATION DELETED – customer] then indicates a price they are willing to pay for specific power transformer they anticipate will be needed over the following [CONFIDENTIAL INFORMATION DELETED – period].

Local manufacturers will consider whether these prices are acceptable. They can then either agree to the price, or try to negotiate a new price.

[CONFIDENTIAL INFORMATION DELETED – customer] assesses power transformer manufacturers based on a number of categories, including quality, delivery, after sales services and responsiveness. Based on these rankings, allocations are awarded to participating manufacturers. For example, if there are two manufacturers of power transformers under a certain rating, then the manufacturer rated 1 gets 60% of the allocation and manufacturer rated 2 gets 40%.

[CONFIDENTIAL INFORMATION DELETED – customers] contracts are awarded based on tenders. CGP will bid at a price that includes a reasonable margin. The terms of supply and payments are not rigid and are generally an outcome of customer negotiation. Costs towards transport and interest costs on payments, are added on to the base prices

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and [CONFIDENTIAL INFORMATION DELETED – pricing practice]. CGP always builds a margin into its bid price. There is no benefit to winning a bid at an unprofitable price.

From CGP's perspective the critical exercise is accurately estimating its costs, and then controlling those costs once a tender has been awarded to avoid an erosion of the margin position. This is achieved in a number of ways, including [CONFIDENTIAL INFORMATION DELETED – cost control practices]. Over the period, CGP has been successful maintaining its margin on its domestic sales of power transformers, as shown by Confidential Attachment B-2(b) in 2018-19 it had an estimated target of [CONFIDENTIAL INFORMATION DELETED – number] and achieved an actual margin of [CONFIDENTIAL INFORMATION DELETED – number].

(c) Order placement process

If CGP receives a sales order from a customer, then they check whether the order is in accordance with the terms of the underlying agreement. If the order does comply with those terms, CGP will confirm acceptance of order to customer.

(d) Order fulfilment process and lead time

If the order complies with CGP's offer, CGP will register the order into SAP and begin to procure materials and to manufacture the transformers.

On average, the lead time for a power transformers is [CONFIDENTIAL INFORMATION DELETED – period], but this depends on a number of factors including production loading and availability of materials

(e) Delivery terms and process

Once the transformer has passed the final acceptance testing, the production team prepares it for shipment/delivery in accordance with the terms of the contract.

(f) Invoicing process

CGP's finance department prepares the invoice for the customer in accordance with the contractual payment conditions.

(g) Payment terms and process

Payments are made in accordance with the terms specified in the contract.

2. Are any domestic customers related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.

No domestic customers are related to CGP.

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3. If sales are in accordance with price lists or price extras list, provide copies of these lists.

Sales are not in accordance with price lists, or price extras lists. The price is specified in the contract with the customer.

4. Do your domestic selling prices vary according to the distribution channel identified? If yes, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

Given we are dealing with sales of unique product, it is difficult to discern whether prices differ between distribution channel, or whether they differ due to the differences in the product.

5. Did you provide on-invoice discounts and/or off-invoice rebates to the customer or an associate of the customer in relation to the sale of the like goods during the period? If yes, provide a description; and explain the terms and conditions that must be met by the importer to obtain the discount.

No.

6. Did you issue any credit or debit notes (directly or indirectly) to the customer or associate of the customer in relation to the sale of the like goods during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.

No.

7. The invoice date will normally be taken to be the date of sale. If you are making a claim that a different date should be taken as the date of sale:

- (a) What date are you claiming as the date of sale?
(b) Why does this date best reflects the material terms of sale?

The date which best reflects the material terms of the sale is the date the sales order is lodged. [CONFIDENTIAL INFORMATION DELETED – accounting practice].

D-2 Domestic sales listing

1. Complete the worksheet named “D-2 Domestic sales”

- This worksheet lists all domestic sales (i.e. transaction by transaction) of like goods invoiced within the period, even if they are models not exported to Australia
- If you have claimed in D-1.7 that the date of sale is one other than the invoice date, then add the sales within your claimed date of sale.
- You must provide this list in electronic format using the template provided.
- If you have used formulas to complete this worksheet, these formulas must be retained.
- If there are any other costs, charges or expenses incurred in respect of the sales listed which have not been identified in the table in question D-2 above, add a column for each item. For example, certain other selling expenses incurred.

Please refer to Confidential Attachment D-2 - Domestic sales.

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2. Provide a table listing the source of the data for each column in the domestic sales listing (D-2.1).

The data in Confidential Attachment D-2 [CONFIDENTIAL INFORMATION DELETED – source].

D-3 Sample domestic sales documents

1. Select the two largest invoices by value and provide the following documentation:

- Contracts
- Purchase order and order confirmation
- Commercial invoice and packing list
- Proof of payment and accounts receivable ledger
- Documents showing bank charges
- Delivery invoices

If the documents are not in English, please provide a translation of the documents.

2. For each document, please annotate the documents or provide a table reconciling the details in the domestic sales listing (in D-2) to the source documents (in D-3.1).

Please refer to Confidential Attachments D-3a and D-3b.

D-4 Reconciliation of sales to financial accounts

This section is not required if you have completed B-4.

1. Please complete the worksheet named “B-4 Upwards sales” to demonstrate that the sales listing in D-2 is complete.
 - You must provide this list in electronic format using the template provided.
 - Please use the currency that your accounts are kept in.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
2. Please provide all documents (e.g. general ledgers, trial balances), other than those in A-5 and D-2, required to complete the “Upwards sales” worksheet. If the documents include spreadsheets, all formulas used must be retained.
3. For any amount in the “Upwards sales” worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
 - the name of the source document, including the relevant page number, in column F of the worksheet; and
 - highlight or annotate the amount shown in the source document.

Please refer to Confidential Attachment B-4.

SECTION E DUE ALLOWANCE

E-1 Credit expense

1. Do you provide credit to any domestic customers in relation to sales of like goods (i.e. payment terms that are not on a cash or pre-payment basis)? If yes:

(a) Do you provide a rolling credit facility to your domestic customers (i.e. no specific payment terms agreed at the time of sale)? If yes:

- i. Calculate the accounts receivable turnover for each domestic customer (credit sales divided by the average accounts receivable).
- ii. Calculate the average credit term for each domestic customer by dividing 365 by the accounts receivable turnover

CGP does not provide rolling credit to customers. Payments will be made in accordance with milestones that are set out in the relevant contract.

(b) Do you have short term borrowings or an overdraft facility? If yes, what is the interest rate, or average of interest rates?

Yes, CGP has an overdraft facility of [CONFIDENTIAL INFORMATION DELETED – amount] from [CONFIDENTIAL INFORMATION DELETED – institution]. The average interest rate on this is [CONFIDENTIAL INFORMATION DELETED – amount].

(c) Do you have term deposits or other cash product (e.g. bonds)? If yes, what is the interest rate, or average of interest rates?

No CGP does not hold any such instruments.

2. Do you provide credit to any Australian customers in relation to sales of the goods (i.e. payment terms that are not on a cash or pre-payment basis)? If yes:

(a) Do you provide a rolling credit facility to your Australian customers (i.e. no specific payment terms agreed at the time of sale)? If yes:

- i. Calculate the accounts receivable turnover for each domestic customer (credit sales divided by the average accounts receivable).
- ii. Calculate the average credit term for each domestic customer by dividing 365 by the accounts receivable turnover

CGP does not provide rolling credit to customers. Payments are made in accordance with the milestones are set out in the contract between CGP and the customer.

(b) If your Australian customers pay you into a foreign currency denominated account (question B-1.2(a) refers):

- i. Do you have short term borrowings or an overdraft facility denominated in the same foreign currency? If yes, what is the interest rate, or average of interest rates?

CGP does not have any overdraft or short-term borrowing facilities in Australia. CGP does has an operational bank account with [CONFIDENTIAL INFORMATION DELETED – institution] in AUD currency for receiving collection and making payment.

- ii. What is the interest rate, or average of interest rates, applying to term deposits or other cash product (e.g. bonds) denominated in the same foreign currency? If yes, what is the interest rate, or average of interest rates?

No CGP does not hold any such instruments.

E-2 Packaging

1. What is the packaging used for your domestic sales of like goods?

Please refer to Confidential Attachment E-2 – Packaging. Please note that actual packaging costs are reported in the CTMS and so would be included in any constructed normal value.

2. What is the packaging used for your export sales of the goods to Australia?

Please refer to Confidential Attachment E-2 – Packaging. Please note that actual packaging costs are reported in the CTMS and so would be included in any constructed normal value.

3. If there are distinct differences in packaging between your domestic and export sales:

- (a) Provide details of the differences
- (b) Calculate the weighted average packaging cost for each model sold on the domestic market
- (c) Calculate the weighted average packaging cost for each model exported to Australia

Please refer to Confidential Attachment E-2 – Packaging. Please note that actual packaging costs are reported in the CTMS and so would be included in any constructed normal value.

E-3 Delivery

1. Are any domestic sales of like goods delivered to the customer? If yes, how were the transportation costs calculated in the domestic sales listing in D-2?

Yes. Actual transportation costs are recorded in the D-2 sales listing. Please note that these expenses may be separately invoiced to the customer.

2. What are the delivery terms of the export sales of the goods to Australia?

Historically Australian sales have been on [CONFIDENTIAL INFORMATION

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DELETED – delivery] terms to the site of installation. This applies to the [CONFIDENTIAL INFORMATION DELETED – sale].

3. If the delivery terms of the Australian sales includes delivery to the port, how were the inland transport and port charges calculated in the Australian sales listing in B-2?

CGP would be able to report the actual costs.

4. If the delivery terms of the Australian sales includes ocean freight, how was the ocean freight cost calculated in the Australian sales listing in B-2?

CGP would be able to report the actual costs.

5. If the delivery terms of the Australian sales include marine insurance, how was the marine insurance calculated in the Australian sales listing in B-2?

CGP would be able to report the actual costs.

6. If the delivery terms of the Australian sales includes delivered duty paid, how were the Australian importation and delivery costs calculated in the Australian sales listing in B-2?

CGP would be able to report the actual costs.

E-4 Other direct selling expenses

1. Do you provide sales commissions for domestic sales of like goods and/or export sales of the goods? If yes, provide details.

CGP does not provide sales commission for domestic sales, nor has it done so for Australian sales in the past. However, CGP does have agreements with agents in [CONFIDENTIAL INFORMATION DELETED – markets] that may require the payment of commissions in relation to sales in those markets.

2. Are there any differences in tax liability between domestic and export sales? If yes, provide details, for example:

Yes.

3. What is the rate of value-added tax (VAT) on sales of the goods and like goods?

Domestic sales include a 10% VAT that is not included on Export Sales.

- How is VAT accounted for in your records in relation to sales of the goods and like goods?

[CONFIDENTIAL INFORMATION DELETED – customer] collects tax on behalf of the Indonesian government, and so pays VAT directly to tax

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office. CGP is given a deposit slip.

In case of sales to [CONFIDENTIAL INFORMATION DELETED – customers], VAT is paid by the customer to CG and CG adjusts the same with input VAT and claims the balance refund from the government.

- Do you receive a VAT refund in relation to sales of the goods and/or like goods?

See above.

- Do you receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods?

No.

4. Are there any other direct selling expenses incurred by your company in relation to domestic sales of like goods?

- These direct selling expenses must be included in the reconciliation of direct selling expenses in B-5

As CGP did not export any goods to Australia during the period, CGP has no direct selling expenses to report.

5. Are there any other direct selling expenses incurred by your company in relation to export sales of the goods to Australia?

- These direct selling expenses must be included in the reconciliation of direct selling expenses in B-5

Please refer to Confidential Attachment B-5.

E-5 Other adjustment claims

1. Are there any other adjustments required to ensure a fair comparison between the export price and the normal value (based on domestic sales, costs and/or third country sales)? If yes, provide details.

- An adjustment will only be made where there is evidence that the difference affects price comparability.
- Refer to Chapter 14 of the Dumping and Subsidy Manual for more information.

SECTION F THIRD COUNTRY SALES

F-1 Third country sales process

1. Are your sales processes to any third country (i.e. exports to countries other than Australia) different to the sales process described in B-1.1? If yes, provide details of the differences.

Other than the domestic market, the main market into which CGP sells the goods are [CONFIDENTIAL INFORMATION DELETED – market], the [CONFIDENTIAL INFORMATION DELETED – market], [CONFIDENTIAL INFORMATION DELETED – market] and [CONFIDENTIAL INFORMATION DELETED – market].

The sales process into these countries is akin to that undertaken for any hypothetical Australian sales. CGP has residential engineers operating in the [CONFIDENTIAL INFORMATION DELETED – markets]. These individuals identify opportunities for sale within these countries to CGP. CGP will then draw up a design and compete in a tender. CGP also has sales office in the [CONFIDENTIAL INFORMATION DELETED – markets].

[CONFIDENTIAL INFORMATION DELETED – market] is a very similar market to the Australian market, in terms of prevailing economic conditions and the maturity of grid infrastructure. In FY18 made a margin of [CONFIDENTIAL INFORMATION DELETED – number] on the transformers, it delivered into the [CONFIDENTIAL INFORMATION DELETED – market].

CGP's long-term strategy involves further expansion into the [CONFIDENTIAL INFORMATION DELETED – markets] as well as entry into [CONFIDENTIAL INFORMATION DELETED – markets]. CGP expects [CONFIDENTIAL INFORMATION DELETED – market] to be the fastest growing in South East Asia in the future. Please refer to page 15 of Confidential Attachment F-1b, which outlines CGPs current market strategy in this regard.

2. Are there any third country customers related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.

No. No third country sales are to related entities.

3. The invoice date will normally be taken to be the date of sale. If you are making a claim that a different date should be taken as the date of sale:

- (a) What date are you claiming as the date of sale?
- (b) Why does this date best reflects the material terms of sale?

Similar to Australian and domestic sales, the date of sales order is the one that best reflects the material terms of the sale, because it is at this point that the price is ascertained on the basis of the provisions of the relevant contract.

F-2 Third country sales listing

1. Complete the worksheet named "F-2 Third country sales"
 - This worksheet lists all export sales, summarised by country and customer, to third countries of like goods invoiced within the period.
 - If you have claimed in F-1.3 that the date of sale is one other than the invoice date, then add sales with your claimed date of sale.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Please refer to Confidential Attachment - F-2 Third country sales.

2. Provide a table listing the source of the data for each column in the export sales listing (F-2.1).

[CONFIDENTIAL INFORMATION DELETED – source of data]

F-3 Differences in sales to third countries

1. Are there any differences in sales to third countries which may affect their comparison to export sales to Australia? If yes, provide details.

Each power transformer is uniquely designed to a customer's requirements.

SECTION G COST TO MAKE AND SELL

G-1. Production process

1. Describe the production process for the goods and provide a flowchart of the process. Include details of all products manufactured using the same production facilities as those used for the goods. Also specify all scrap or by-products that result from producing the goods.

The production process for power transformers is as follows:

[CONFIDENTIAL INFORMATION DELETED – production process]

Please refer to Confidential Attachment G-1 for a diagram outlining this process.

2. Are any of your suppliers related to your company (regardless of whether it is relevant to the manufacture of the goods)? If yes, please provide details including the product or services supplied by the related company.

Not applicable. No suppliers are related to CGP.

G-2. Cost accounting practices

1. Is your company's cost accounting system based on actual or standard costs (budgeted)?

[CONFIDENTIAL INFORMATION DELETED – accounting practices]

2. If you company uses standard costs:

- (a) Were standard costs used as the basis of actual costs in your responses G-3.1 & G-5.1?
- (b) Have all variances (i.e. differences between standard and actual production costs) been allocated to the goods?
- (c) How were those variances allocated?
- (d) Provide details of any significant or unusual cost variances that occurred during the period.

Not applicable.

3. Do you have different cost centres in your company's cost accounting system? If yes, list the cost centres, provide a description of each cost centre and the allocation methodology used in your accounting system.

Not applicable. CGP does not have different cost centers.

4. To what level of product specificity (models, grades etc.) does your company's cost accounting system normally record production costs?

Production costs are recorded to the individual transformer.

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5. Are there any costs for management accounting purposes valued differently to financial accounting purposes? If yes, provide details of the differences.

Not applicable.

6. Has your company engaged in any start-up operations in relation to the goods? If yes:
- Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.
 - State the total cost of the start-up operation and the way that your company has treated the costs of the start-up operation in its accounting records.

No, CGP has not engaged in any start-up operations.

7. What is the method of valuation for raw material, work-in-process, and finished goods inventories (e.g. last in first out –LIFO, first in first out- FIFO, weighted average)?

Inventories are stated at the lower of cost or net realizable value:

[CONFIDENTIAL INFORMATION DELETED – valuation methodologies]

8. What are the valuation methods for damaged or sub-standard goods generated at the various stages of production?

Damaged and substandard goods are valued at fair market value.

9. What are the valuation methods for scrap, by products, or joint products?

The value of scrap is quantified when it is sold.

10. Are any management fees/corporate allocations charged to your company by your parent or related company? If yes, provide details

[CONFIDENTIAL INFORMATION DELETED – details of inter-group dealings]

G-3 Cost to make and sell on domestic market

- Complete the worksheet named "G-3 Domestic CTMS".
 - Please provide the actual cost to make and sell each model/type (as identified in section C) of the like goods sold on the domestic market. Provide this cost data for each unique unit of the goods invoiced during the investigation period.
 - Indicate the source of cost information (account numbers etc) and/or methods used to allocate cost to the goods. Provide documentation and worksheets supporting your calculations.
 - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture like goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
 - You must provide this list in electronic format using the template provided.

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- If you have used formulas to complete this worksheet, these formulas must be retained.

Please refer to Confidential Attachment - G-3 Domestic CTMS.

2. Provide a table listing the source of the data for each column of the "Domestic CTMS" listing (G-3.1).

[CONFIDENTIAL INFORMATION DELETED – data source]

G-4 Selling, General & Administration expenses

1. Complete the worksheet named "G-4.1 SG&A listing".
 - This worksheet lists all selling, general and administration expenses by account code for the most recent accounting period and the period.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Please refer to Confidential Attachment G-4 - SG&A.

2. Complete the worksheet named "G-4.2 Domestic SG&A calculation".
 - This worksheet calculates SG&A as a percentage of revenue.
 - You must provide this list in electronic format using the template provided.
 - Please use the formulas provided.

Please refer to Confidential Attachment G-4 - SG&A.

G-5 Cost to make and sell the goods exported to Australia

1. Complete the worksheet named "Australian CTMS".
 - Please provide the actual cost to make and sell each model/type (as identified in section C) exported to Australia.
 - Provide this information for all goods invoiced during the investigation period and for all goods the subject of a contract that was entered into during the investigation period, but invoiced or delivered outside of the investigation period. Where actual costs are not yet incurred, provide an estimate of these costs, such as for example, the estimate of the costs that formed the basis of your winning tender bid.
 - Provide this information for each unique unit of the goods contracted for sale or invoiced during the period of the investigation. For example, if one contract specifies production of two different types of the goods, provide this information for each type of the goods.
 - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
 - If you have claimed in B-1.8 that the date of sale is one other than the invoice date, then provide the cost for the duration that all Australian sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.

Please refer to Confidential Attachment G-5, which shows the current CTMS [CONFIDENTIAL INFORMATION DELETED – details of sale].

2. Provide a table listing the source of the data for each column of the “Australian CTMS” listing (G-5.1).

[CONFIDENTIAL INFORMATION DELETED – data source]

G-6 Cost allocation methodology

1. What is the allocation methodology used to complete in G-3 Domestic CTMS and G-5 Australian CTMs for:
 - (a) Raw materials
 - (b) Labour
 - (c) Manufacturing overheads

These costs have been allocated as follows:

- (a) Raw Material consumption is booked based on actuals and monitored as per [CONFIDENTIAL INFORMATION DELETED – records]
- (b) Labour costs are allocated based on yearly averages that are around 1[CONFIDENTIAL INFORMATION DELETED – number].
- (c) Overhead costs are allocated based on yearly averages that are in the range of [CONFIDENTIAL INFORMATION DELETED – number].

2. Select the domestic model (export model if you have no domestic production of like goods) with the largest production cost over the period and provide worksheets demonstrating the allocation methodology described in G-6.1 from your normal cost accounting system to the cost for that model reported in G-3.1.

Please refer to Confidential Attachment G-3 - Domestic CTM.

G-7 Major raw material costs

1. What the major raw materials used in the manufacture of the goods?

The major raw material used in the manufacture of power transformers are:

[CONFIDENTIAL INFORMATION DELETED – raw materials]

2. Are any raw materials sourced as part of an integrated production process or from a subsidiary company which your company exercise control? If yes, provide details of these in worksheet G-7.2.

No.

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- Using the domestic cost data in G-3, calculate the weighted average percentage of each raw material cost (listed in G-7.1) as a proportion of total cost to make.

The main raw material costs are as follows:

[CONFIDENTIAL INFORMATION DELETED – raw materials]

- For each raw material identified in G-7.1 which individually accounts for 10% or more of the total cost to make, complete the worksheet named “G-7.4 Raw material purchases”.
 - This worksheet lists all raw material purchases (i.e. transaction by transaction) purchased by your company within the period.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Please refer to Confidential Attachment G-7.4 – Raw material purchases.

- Provide a table listing the source of the data for each column of the “Raw material purchases” listing (G-7.4).

Please refer to Confidential Attachment G-7.4 – Raw material purchases.

- For each raw material:
 - Select the two largest invoices by value and provide the commercial invoice and proof of payment.
 - Reconcile the total value listed of the purchases in G-7.4 to relevant purchase ledgers or trial balances in your accounting system. Provide copies of all documents used to demonstrate the reconciliation.

Please refer to Confidential Attachments G-7.6(a)1 and G-7.6(a)2.

Please note that the data for Confidential Attachment G-7.4 has been taken directly from the relevant purchase ledgers.

- Are any of the suppliers listed in G-7.4 related to your company? If yes, please provide details on how the price is set.

No materials are sourced in-house or from associated entities.

G-8 Reconciliation of cost to make to audited financial statements

- Please complete the worksheet named “Upwards costs”.
 - You must provide this list in electronic format using the template provided.
 - Please use the currency that your accounts are kept in.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

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Please refer to Confidential Attachment G-8 – reconciliation of costs.

2. Please provide any documents, other than those in A-5, G-3 and G-5, required to complete the “Upwards costs” worksheet.
3. For any amount that is hard coded (i.e. not a formula), please cross-reference by providing:
 - the name of the source document, including the relevant page number, in column F of the worksheet; and
 - highlight or annotate the amount shown in the source document.

G-9 Capacity Utilisation

4. Please complete the worksheet named “Capacity Utilisation”.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Please refer to Confidential Attachment G-9 - Capacity Utilization.

When CGP is plans it production schedule, it takes into consideration factors beyond its control that will affect productivity, such as [CONFIDENTIAL INFORMATION DELETED – events]. To account for such unplanned events, CGP targets a capacity utilization of around [CONFIDENTIAL INFORMATION DELETED – percent]. The 2018 capacity utilization of [CONFIDENTIAL INFORMATION DELETED – number] is realistically the maximum utilization of the factory.

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EXPORTER'S DECLARATION

I hereby declare that PT CG POWER SYSTEMS INDONESIA (company) have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this submission is complete and correct to the best of my knowledge and belief.

Name : LLOYD JOSEPH GERARD LUCAS PINTO

Signature :

A handwritten signature in blue ink, appearing to read 'Lloyd Joseph Gerard Lucas Pinto', with a horizontal line underneath.

Position in

Company : PRESIDENT DIRECTOR

Date : 01 APRIL 2019

APPENDIX GLOSSARY OF TERMS

This glossary is intended to provide you with a basic understanding of technical terms that appear in the questionnaire.

Adjustments

To enable a fair comparison between the export price and the normal value Australian legislation provides for the adjustment of the domestic price paid for like goods. Adjustments are made to account for sales occurring at different times, specification differences, and differences in the terms or circumstances of the sales. The adjustment to the normal value may be upward or downward. Areas where you believe an adjustment is necessary should be identified. Section E of the questionnaire refers.

Examples of adjustments that may be made include: *sales occurring at different times* (it is sometimes necessary to compare domestic and export sales made at different times - in these circumstances an adjustment may be made to reflect price movements during that time); *specification differences; packaging; taxes; level of trade; advertising; servicing/warranty; inland freight; warehousing; export charges; credit terms; duty drawback; commissions.*

Adjustments may also be required where the normal value is based on costs to make and sell.

Arms length

Sales are not considered to be at "arms length" on your domestic market if there is any consideration payable for the goods other than their price, or there is an association between the buyer and the seller which affects the price, or there will be a reimbursement, compensation or benefit for, or in respect of, the price.

Constructed value

In cases where prices paid for like goods sold in the country of export cannot be used for the determination of normal value, i.e. when there are no or insufficient sales or where such sales were not made in the ordinary course of trade, normal value may be based on a constructed value. Constructed value is calculated on the basis of the cost of production of the goods under consideration plus a reasonable amount for selling, general and administration costs, and for profits, that are associated with sales on the domestic market of the country of export.

Cost of production/manufacturing

The cost of production or manufacture consists of all manufacturing costs associated with the goods. It is the sum of direct materials, direct labour and factory overheads.

Cost to make and sell

The cost to make and sell is the sum of the cost of production or manufacture, and the selling, general and administration costs associated with the sale of those goods.

Country of origin

The country in which the last significant process in the manufacture or production of the goods was performed.

Date of sale

The Commission will normally use the invoice date as recorded in the exporter or producer's records. Another date may be used if this better reflects the material terms of sale. The questionnaire directs attention to matching data sets of domestic and export sales where some other date is used, as well as matching cost information.

Direct labour cost

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Direct labour is categorised as a variable cost, i.e. the value varies with the level of production.

Dumping

Dumping occurs when the products of one country are exported to another country at a price less than their normal value.

Dumping margin

Where the export price is less than the normal value the dumping margin is the amount of the difference. It can be expressed as a value or as a percentage of the export price.

Export price

The export price of the goods is usually the price paid or payable to the exporter in arms length transactions, in most instances calculated at the Free on Board (FOB) level.

Exporting country

The country of export is normally the country of origin from which the goods are shipped. The country of export may be an intermediate country, except where the products are merely transhipped through that country, or the products concerned are not produced in that country, and there is no comparable price in that country.

Factory overheads

Factory overheads consist of variable costs e.g. power, supplies, indirect labour and fixed costs e.g. factory rent, factory insurance, factory depreciation etc.

Goods under consideration (the goods)

The goods to which the application for anti-dumping action relates. That is, the goods that you have exported to Australia allegedly at dumped prices.

Incoterms

The following abbreviations are commonly used (comment is provided concerning costs that are normally borne by the seller):

EXW	ex works (the seller's minimum obligation as costs relate to goods being made available at the sellers premises)
FCA	free carrier (main carriage not paid by seller. Pay costs until such time that the goods have been delivered at the named point into custody of a carrier named by the seller. Customs formalities, taxes etc. paid if required)
FAS	free alongside ship (main carriage not paid by seller. Deliver the goods alongside the ship)
FOB	free on board (main carriage not paid by seller. Deliver the goods on board, provide export clearance if required, pay loading costs to the point the goods have passed the ship's rail, pay customs formalities, taxes etc. payable upon exportation)
CFR	cost and freight (main carriage paid by seller. Pay all costs until delivered as well as freight, loading and unloading, pay customs formalities, taxes etc. payable upon exportation)
CIF	cost, insurance and freight (main carriage paid by seller. Pay all costs as under CFR as well as marine insurance)
CPT	the terms CFR and CIF are only used where goods are carried by sea or waterway transport
CIP	carriage paid to carriage and insurance paid to the terms CPT and CIP are used as alternatives to CFR and CIF where the goods are carried by air, road, rail etc.
DAF	delivered at frontier (goods carried by rail or road and cleared for export at the named place at the frontier. Pay costs until delivered at the frontier plus any discharge costs incurred to place the goods at the customer's disposal)

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DES	delivered ex ship (goods made available to the buyer on board the ship uncleared for import at the named port of destination. Pay all costs incurred in placed at the disposal of the buyer, pay customs formalities, taxes etc. payable upon exportation, and where necessary for transit through another country)
DDU	delivered duty unpaid (Pay all costs for carriage to the agreed point, pay customs formalities, taxes etc. payable upon exportation, and where necessary for transit through another country)
DDP	delivered duty paid (goods made available at the named place in the country of importation – all risks and costs being incurred by the seller including duties, taxes etc. incurred upon importation)

The period

A period defined by the Commission over which importations of the goods are examined.

Like goods

Like goods are goods sold on the domestic market of the country of export (or to a third country) that are identical in all respects to the goods or that, although not alike in all respects have characteristics closely resembling those of the goods. The term 'like goods' also refers to the goods produced by the Australian industry allegedly being injured by dumped imports.

Normal value

Australian legislation sets out several ways to assess "normal value".

The preferred method is to use the price paid for like goods sold for domestic consumption in the country of export. Usually, these sales are made by you, but there may be circumstances where it is appropriate to use sales made by other sellers on the domestic market.

Sale prices must be at arms length and in the ordinary course of trade. In the absence of relevant or suitable domestic sales, the normal value may be determined by constructing a price based on all costs to make and sell the goods, and an amount for profit. Alternatively the normal value may be ascertained using the price paid for like goods sold in the ordinary course of trade at arms length to customers in a country other than Australia, however this option is rarely used.

Finally, when a normal value cannot be ascertained by any of the above methods, or if no information is provided, the Commission will determine the normal value by considering all the relevant information, including the applicant's information. This allows the applicant's information to be used where sufficient information has not been furnished or is not available.

Where domestic price generally, and the trade of the exporting country are determined or substantially influenced by the government of the exporting country, an alternative/surrogate market economy is selected by the Commission and the normal value is determined as if the surrogate country were the export source.

Ordinary course of trade

Testing for "ordinary course of trade" includes a comparison of the selling price and the unit cost to make and sell for the same period. If sales in respect of a substantial quantity of goods over an extended period of time, usually 12 months, do not recover all costs and these losses are not likely to be recovered within a reasonable period of time, (again usually 12 months) then the sales are regarded as being not in the ordinary course of trade.

There may be circumstances where it is appropriate to use a period other than 12 months in assessing whether sales are in the ordinary course of trade.

Unprofitable sales are to be taken to have occurred in substantial quantities during an extended period where the unprofitable sales amount to 20% or more of the total volume of sales of the goods by the exporter over the period. An extended period of time is usually taken to be a period not less than 12 months. Where unprofitable sales are rejected, normal value is based upon remaining profitable sales provided they occur in sufficient number. Where all sales have been made at a loss, or profitable sales are insufficient, the normal value may be

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constructed from costs to make and sell.

Selling, general and administration expenses (SG&A)

The selling, general and administration expenses includes all selling, distribution, general and administration expenses including finance costs that would be incurred if the goods were sold for domestic consumption in the country of export. The amounts are determined in each case using all the available information and may include expenses incurred in:

- . domestic sales of like goods;
- . sale of goods of the same general category by the exporter; or
- . sales in the industry in the country of export.

The expenses must, however, reflect the selling, general and administration costs of the goods. Administrative and selling expenses include: director's fees, management salaries and benefits, office salaries and benefits, office supplies, insurance, promotion, entertainment, depreciation and corporate overheads.