



Australian Government
Department of Industry,
Innovation and Science

Anti-Dumping
Commission

Exporter Questionnaire

Case number: 517

Product: DEEP DRAWN STAINLESS STEEL SINKS

From: The People's Republic of China

Inquiry period: 01 July 2018 to 30 June 2019 (the inquiry period)

Response due by: Friday 9 August 2019

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

Anti-Dumping Commission website: www.industry.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 a continuation inquiry into deep drawn stainless steel sinks exported to Australia from the People's Republic of China (China).

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 deep drawn stainless steel sinks are dumped. The Commission will also use this information to determine whether deep drawn stainless steel sinks have been in receipt of countervailable subsidies over the period.

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 and a subsidy 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 and subsidy margin. The Commission considers that the dumping margin and subsidy 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-4.6)
- 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	<input type="checkbox"/>
Section B Export sales to Australia	<input type="checkbox"/>
Section C Exported goods & like goods	<input type="checkbox"/>
Section D Domestic sales	<input type="checkbox"/>
Section E Due allowance	<input type="checkbox"/>
Section F Third country sales	<input type="checkbox"/>
Section G Cost to make and sell	<input type="checkbox"/>
Error! Reference source not found.	<input type="checkbox"/>
Section H Countervailing	<input type="checkbox"/>
Exporter's declaration	<input type="checkbox"/>
Non-confidential version of this response	<input type="checkbox"/>

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Attachments	Please tick if you have provided spreadsheet
B-2 Australian sales	<input type="checkbox"/>
B-4 Upwards sales	<input type="checkbox"/>
B-5 Upwards selling expenses	<input type="checkbox"/>
D-2 Domestic sales	<input type="checkbox"/>
F-2 Third country sales	<input type="checkbox"/>
G-3 Domestic CTM	<input type="checkbox"/>
G-4.1 SG&A listing	<input type="checkbox"/>
G-4.2 Dom SG&A calculation	<input type="checkbox"/>
G-5 Australian CTM	<input type="checkbox"/>
G-7.2 Raw material CTM	<input type="checkbox"/>
G-7.4 Raw material purchases	<input type="checkbox"/>
G-8 Upwards costs	<input type="checkbox"/>
G-9 Capacity Utilisation	<input type="checkbox"/>
I-1 Company Turnover	<input type="checkbox"/>
I-3 Income Tax	<input type="checkbox"/>
I-4 Grants	<input type="checkbox"/>

GOODS SUBJECT TO ANTI-DUMPING MEASURES

The goods subject to anti-dumping measures (the goods) are:

Deep drawn stainless steel sinks with a single deep drawn bowl having a volume of between 7 and 70 litres (inclusive), or multiple drawn bowls having a combined volume of between 12 and 70 litres (inclusive), with or without integrated drain boards, whether finished or unfinished, regardless of type of finish, gauge, or grade of stainless steel and whether or not including accessories.

Additional information

Further information in relation to the goods was provided in the application as follows.

For the purposes of the definition of the goods, the term "deep drawn" refers to a manufacturing process using metal forming technology to produce a smooth basin with seamless, smooth, and rounded corners. Deep drawn stainless steel sinks are available in various shapes and configurations and may be described in a number of ways including flush mount, top mount, or undermount (to indicate the attachment relative to the countertop). Stainless steel sinks with multiple deep drawn bowls that are joined through a welding operation to form one unit are covered by the scope of the investigations. "Finished or unfinished" refers to whether or not the imported goods have been surface treated to their intended final "finish" for sale. Typically, finishes include brushed or polished.

Deep drawn stainless steel sinks are covered by the scope of the investigation whether or not they are sold in conjunction with accessories such as mounting clips, fasteners, seals, sound-deadening pads, faucets (whether attached or unattached), strainers, strainer sets, rinsing baskets, bottom grids, or other accessories.

Excluded from the definition of the goods the subject of this application are stainless steel sinks with fabricated bowls. Fabricated bowls do not have seamless corners, but rather are made by notching and bending the stainless steel, and then welding and finishing the vertical corners to form the bowls. Stainless steel sinks with fabricated bowls may sometimes be referred to as "fabricated sinks".

Deep drawn stainless steel sinks are commonly used in residential and non-residential installations including in kitchens, bathrooms, utility and laundry rooms. When used in the context of bathrooms, deep drawn stainless steel sinks may there be referred to, for marketing purposes, as "wash basins". As noted above, deep drawn stainless steel sinks may, or may not, have a single (or multiple) integrated drain board that forms part of the sink structure, designed to direct water into the sink bowl.

Model Control Code

On 9 August 2018, the Commission announced its policy and practice in regards to model control code (MCC) structures via ADN No. 2018/128¹.

Chapter 14 of the Anti-Dumping Commission's *Dumping and Subsidy Manual* further explains that the MCC structure provides a system of identifying fundamental characteristics of the goods subject to investigation and assigns an alphanumeric code to define categories and sub-categories of the goods and like goods. The objective of the MCC structure is to provide a framework for comparing goods exported to Australia with similar like goods sold on an exporter's domestic market.² This process is commonly referred to as 'model matching'.

Model matching assists the Commission to assess whether dumping has occurred and is a useful way to ensure that the normal value is properly comparable with the export price.

In determining an MCC structure for any given case, the Commission will have regard to differences in physical characteristics that give rise to distinguishable and material differences in price.

In the original investigation (REP 238) the Commission found that the goods and like goods vary in a number of different ways, and that there were many physical characteristics influencing prices. There were also different consumer preferences on the Australian and Chinese markets. The above factors limited the Commission's ability to identify sales of like goods that would be relevant for the purpose of determining a price under subsection 269TAC(1). The Commission considers it is likely that similar issues will be present in this inquiry. As a result, the Commission has elected not to propose an MCC structure at the outset of this inquiry. However, information gathered in responses received from importers and exporters, and from the Australian industry, will be examined to assess if an appropriate MCC structure can be developed.

If an MCC structure is developed interested parties will have an opportunity to discuss the structure and propose modifications. Any changes to the MCC structure will be considered by the Commission and reported in verification reports or in the statement of essential facts (SEF).

¹ Available at www.industry.gov.au.

² Full guidance regarding the Commission's application of an MCC structure is provided at section 14 of the Anti-Dumping Commission *Dumping and Subsidy Manual* which is available at www.industry.gov.au.

SECTION A COMPANY INFORMATION

A-1 Company representative and location

1. Please nominate a contact person within your company:

Response:

Name: Ms. Huang Yali

Position in the company: Sales Manager

Address: Primy Industrial Park, No.220, Dexiang Road, Pingsha, Zhuhai, China.

Telephone: 0086-756-7722222-808

E-mail address: lilya@primyonline.com

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

Response:

Name: Mr. Li Fayin

Position: Partner

Firm: JunZeJun Law Offices

Address: 11F Jinbao Tower, 89 Jinbao St, Dongcheng District, Beijing

Telephone: 0086-13910985989

E-mail address: lifayin@junzejun.com

Name: Mr. Andrew Percival

Position: Principal

Firm: Percival Legal

Telephone: 0425 221 036

E-mail address: andrew.percival@percivallegal.com.au

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

Response: Confirmed.

4. Please provide the location of the where the company's financial records are held.

Response:

The Company's financial records are held at its head office, Primy Industrial Park, No.220, Dexiang Road, Pingsha, Zhuhai, China.

5. Please provide the location of the where the company's production records are held.

Response:

The Company's production records are held at its head office, Primy Industrial Park, No.220, Dexiang Road, Pingsha, Zhuhai, China.

A-2 Company information

1. What is the legal name of your business?

Response:

Primy Corporation Limited (hereinafter refer to as "Primy")

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

Response:

Primy does not trade under a different name or brand.

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

Response:

Primy was not known by a different legal or trading name.

4. Provide a list of your current board of directors and any changes in the last two years.

Response:

Mr. Chen Jianfa remains the executive director of Primy for the relevant period and last two years.

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

(a) A diagram showing the complete ownership structure; and

(b) A list of all related companies and its functions

Response:

Primy is related to the below companies by common individual shareholders, family relationship between individual shareholders or direct/indirect investment relationship:

Zhuhai Mingcai Mould Co., Ltd.

Shareholder: Chen Jianfa 70%, Luo Bixia 30%

The company is mainly manufacturing hardware parts for Gree Electronics Co. Ltd, an unaffiliated electronics producer;

Zhuhai Dexin Investment Co., Ltd.

Shareholder: Chen Jianfa 90%, Luo Bixia 10%

The company mainly invests in projects.

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Zhuhai Sansheng Mould Co., Ltd.

Shareholder: Zhuhai Dexin Investment Co., Ltd., Luo Bixia 35%

The company mainly designs and produces moulds based on customers' requirements.

Beijing PRIMY Kitchenware Sales Co. Ltd.

Shareholder: Chen Xiaoyan, 100%, niece of Chen Jianfa;

Domestic distribution of Primy's products.

Primy Trading (HK) Limited

Shareholder: Primy Corporation Limited 100%

International distribution of Primy's products.

Primy Technology Co., Ltd.

Shareholder: Chen Jiafa, 90%, Luo Bixia, 10%.

The company is not in operation.

Zhuhai Boda Intelligent Technology Partnership

Partners: Chan Jianba (Chen Jianfa's brother), Chen Jianfa, Zhao Yuzhu, Hu Bo, Liu Wei, Chen Dangdang

The partnership is engaged in program operations.

Primy Zhima Techonology Co., Ltd.

Shareholder: Primy Corporation Limited 82%, Zhuhai Boda Intelligent Technology Partnership 18%

The company produces and sells intelligent toilets.

Zhuhai Boda Ruitong Technology Partnership

Partners: Primy Corporation Limited, Duan Liping

The company is not in operation yet.

Primy Zhilin Sanitary Ware Co., Ltd.

Shareholder: Primy Corporation Limited 70%, Zhuhai Boda Ruitong Technology Partnership 30%

The company sells shower rooms.

Zhuhai Youshang Kitchen & Bathroom Products Co., Ltd.

Shareholder: Chen Ting 100% (Chen Jianfa's neice)

Domestic distribution of Primy's products.

6. Is your company or parent company publically listed? If yes, please provide:

(a) The stock exchange where it is listed; and

(b) Any principle shareholders³

If no, please provide:

(a) A list of all principal shareholders and the shareholding percentages.

Response:

Primy is not publically listed. Please refer to Exhibit A-2-6 the shareholders information.

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

Response:

Primy is both producer and seller of the subject merchandise. Primy also produces faucets and accessories and cabinets. Primy sells its product domestically and to Europe, North and South America, Southeast Asia and Australia, among other destinations.

8. If your business does not perform all of the following functions in relation to the goods under consideration, then please provide names and addresses of the companies which perform each function:

(a) produce or manufacture;

(b) sell in the domestic market;

(c) export to Australia; and

(d) export to countries other than Australia.

Response:

Primy preforms all the functions listed in the question.

9. Provide your company's internal organisation chart.

Response:

Please refer to Confidential Exhibit A-2-9.

10. Describe the functions performed by each group within the organisation.

Response:

Please refer to Confidential Exhibit A-2-9.

³ Principal shareholders are those who are able to cast, or control the casting of, 5% or more of the maximum amount of votes that could be cast at a general meeting of your company.

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11. Does your company produce brochures, pamphlets or other promotional material? If yes, please provide them.

Response:

Please refer to Exhibit A-2-10 the brochure of Primy.

A-3 General accounting information

1. What is your financial accounting period?

Response:

The accounting period of Primy is the calendar year.

2. Are your financial accounts audited? If yes, who is the auditor?

Response:

Primy's financial accounts are audited by ZHUHAI GONGZHONG UNITED CPAs.

3. What currency are your accounts kept in?

Response:

Primy kept its accounts in RMB yuan.

4. What is the name of your financial accounting system?

Response:

Primy uses the Chinese financial accounting system Yongyou.

5. What is the name of your sales system?

Response:

Primy uses the sales system Infor.

6. What is the name of your production system?

Response:

Primy uses the production system Infor.

7. If your financial accounting, sales and production systems are different, how do the systems interact? Is it electronically or manual? Please provide a detailed explanation and include diagrams.

Response: The sales and production are all in the Infor system. The data of the financial accounting are based on Infor systems.

8. Do your accounting practices differ in any way from the generally accepted accounting principles in your country? If yes, please provide details.

Response:

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Primy's accounting practices are in accordance with the generally accepted accounting principles in China.

9. Have there been any changes to your accounting practices and/or policies over the last two years? If yes, please provide details.

Response:

The accounting practices and policies over the last two years of Primy has not been changed.

A-4 Financial Documents

1. Please provide the two most recently completed annual reports and/or financial statements for your company and any other related companies involved in the production and sale of the goods.

Response:

Please refer to Confidential Exhibit A-4-1.

2. If the financial statements in A-4.1 are unaudited, provide for each company:
- (a) the tax returns relating to the same period; and
 - (b) reconciliation of the revenue, cost of goods sold, and net profit before tax between the financial statements and tax returns.

Response:

Primy's accounts have been audited and therefore this question is not applicable.

3. Does your company maintain different profit centres? If yes, provide profit & loss statements for the profit centre that the goods falls into for:
- (a) the most recent financial year; and
 - (b) the period.

Response:

Primy does not maintain different profit centres.

4. If the period is different to your financial period, please provide:
- (a) Income statements directly from your accounting information system covering the most recent financial period and the period; or
 - (b) Quarterly or half yearly income statements directly from your accounting system covering the most recent financial period and the period.

Response:

Primy has submitted its audited reports in Confidential Exhibit A-4-1.

5. Please provide a copy of your company's trial balance (in Excel) covering the period and the most recent financial year.

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Response: Primy has electronic accounting system and therefore does not use trial balance in its normal accounting practice.

6. Please provide your company's chart of accounts (in Excel).

Response:

Please refer to Confidential Exhibit A-4-6.

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

SECTION B

EXPORT SALES TO AUSTRALIA

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
 - (b) Price determination and/or negotiation process
 - (c) Order placement process
 - (d) Order fulfilment process and lead time
 - (e) Delivery terms and process
 - (f) Invoicing process
 - (g) Payment terms and process

Response: In its exports to Australia,

- (a) Marketing and advertising activities

Primy did not incur marketing or advertising activities because the sales are on OEM basis.

- (b) Price determination and/or negotiation process

Primy quoted price to the customers when asked for such quotes, and engaged in mutual negotiation with the customers to determine the prices.

- (c) Order placement process

If agreement is reached with the customers, the customers would place purchase orders with Primy.

- (d) Order fulfilment process and lead time

This depends on the requirements of the customers and the production schedules of Primy.

- (e) Delivery terms and process

Most of the exports to Australia by Primy are on [REDACTED] basis. In certain situations, the exports could be on [REDACTED] basis.

- (f) Invoicing process

Primy issued invoices to the customers when the goods are shipped.

- (g) Payment terms and process

The payment terms vary depending on the agreement between Primy and the customers.

7. In what currency do you invoice your customers for goods exported to Australia? If it is not in your local currency:
 - (a) Do your customers pay you into a foreign currency denominated account? If yes, provide details;

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- (b) Do you use forward contracts to lock in the foreign exchange rate relating to the export sales? If yes, provide details;
- (c) How is the exchange rate determined in your accounting system and how often is it updated?

Response:

For Australian sales, Primy invoiced customers mostly in [REDACTED]. There are instances that, as agreed with customers, Primy issued invoices in both USD and [REDACTED], and the customers could choose the currency for payments. In such instances, the customers sometimes choose to pay Primy in [REDACTED].

For the sales paid in [REDACTED], the customers paid Primy into its [REDACTED] denominated accounts. Primy does not use forward contracts to lock in the foreign exchange rate relating to the export sales.

Primy uses the exchange rate published by the People's Bank of China on the last day of the previous month or the first day of the current month in which the transaction in foreign currency incurred to record the sales value in [REDACTED] amount. It is updated on monthly basis.

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

Response:

Primy is not related to any Australian customers.

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

Response:

Primy does not have price lists for its exports to Australia. When customers have intentions to purchase, they will contact Primy asking for quotes. Both parties will be engaged in negotiation on price and other trade terms. If agreement is reached, purchase orders will be issued. When the goods are shipped, Primy will issue invoice to the customer and then payment shall be made to Primy by the customers.

10. 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.

Response:

All of the exports to Australia of Primy are on OEM basis. The prices of Primy do not vary due to different distribution channels.

11. Did you provide on-invoice discounts and/or off-invoice rebates to any customer or an associate of the customer in relation to the sale of the goods exported to Australia 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.

Response:

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Primy does not provide on-invoice discounts or off-invoice rebates to any customer or an associate of the customer in relation to the sale of the goods exported to Australia during the period.

12. 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 exported to Australia during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.

Response:

Primy does not issue credit or debit notes to the customers in Australia.

13. 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?

Response:

Primy does not claim date of sale other than the invoice date. Primy used the date of the commercial invoice issued to the customer as the date of sale as it specified the final value and terms with the customers.

B-2 Australian sales listing

NOTE: The Australian sales listing should include exports of goods that are currently exempt from anti-dumping duty under section 8(7) and section 10(8) of the *Customs Tariff (Anti-Dumping) Act 1975*⁴

1. Complete the worksheet named "B-2 Australian sales"

- This worksheet lists **all sales (i.e. transaction by transaction) exported to Australia of the goods invoiced within the period**. This includes exports to Australia sold through a domestic customer.
- 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.

Response: Please refer to Confidential Exhibit B-2. Primy provides following explanations to the reporting of the Australian Sales Listings either because they are

⁴ [ADN 2015/41 \(26 March 2015\)](#), [Exemption No.EX0047 \(11 July 2017\)](#)

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requested for by the Commission or Primy believes clarification is needed for the better understanding of the Commission.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2. Provide a table listing the source of the data for each column in the "B-2 Australian sales" listing.

Response: Please refer to Confidential Exhibit B-2-2.

B-3 Sample export documents

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

- (a) Contracts
- (b) Purchase order and order confirmation
- (c) Commercial invoice and packing list
- (d) Proof of payment and accounts receivable ledger
- (e) Documents showing bank charges
- (f) Invoices for inland transport
- (g) Invoices for port handling and other export charges
- (h) Bill of lading
- (i) Invoices for ocean freight & marine insurance (if applicable)
- (j) Country of origin certificates (if applicable)

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

Response: Please refer to Confidential Exhibit B-3-1, the document package for invoice No. [REDACTED] and invoice No. [REDACTED]. Primy has included more documents than requested in the question to substantiate all the information reported in B-2 Australian Sales Listing. For some information reported, because there are too many products in these invoices, Primy has selected one product from each invoice as sample to substantiate the reported information.

2. For each document, please annotate the documents or provide a table reconciling the details in the "B-2 Australian sales" listing to the source documents in B-3.1.

Response: Please refer to Confidential Exhibit B-3-2, a table linking the documents submitted in Confidential Exhibit B-3-1 to the Confidential Exhibit B-2 Australian Sales Listing for these two invoices. Some additional notes are also added on the documents to facilitate the reconciliation.

For invoice No. [REDACTED], for payment, Primy submits the bank slip for payment [REDACTED].

For invoice No. [REDACTED] for payment, Primy submits the bank slip for payment [REDACTED].

B-4 Reconciliation of sales to financial accounts

3. Please complete the worksheet named "B-4 Upwards sales" to demonstrate that the sales listings in B-2, D-2 and F-2 are complete.

- (a) You must provide this list in electronic format using the template provided.
- (b) Please use the currency that your accounts are kept in.

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

Response: Please refer to Confidential Exhibit B-4.

4. Please provide all documents, other than those in A-4, B-2 and D-2, required to complete the "B-4 Upwards sales" worksheet. If the documents include spreadsheets, all formulas used must be retained.

Response:



5. For any amount in the "B-4 Upwards sales" worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
- (a) the name of the source document, including the relevant page number, in column D of the worksheet; and
 - (b) highlight or annotate the amount shown in the source document.

Response: Please refer to Confidential Exhibit B-4 and EConfidential exhibit B-4-1.

B-5 Reconciliation of direct selling expenses to financial accounts

Response:



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, other than those in A-4, B-2 and D-2, required to complete the "B-5 Upwards selling expense" worksheet. If the documents include spreadsheets, all formulas used must be retained.

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3. For any amount in the "B-5 Upwards selling expense" worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
 - (a) the name of the source document, including the relevant page number, in column C of the worksheet; and
 - (b) highlight or annotate the amount shown in the source document.

SECTION C

EXPORTED GOODS & LIKE GOODS

On 9 August 2018, the Commission announced its policy and practice in regards to model control code (MCC) structures via ADN No. 2018/128.

Chapter 14 of the Anti-Dumping Commission's *Dumping and Subsidy Manual* further explains that the MCC structure provides a system of identifying fundamental characteristics of the goods subject to investigation and assigns an alphanumeric code to define categories and sub-categories of the goods and like goods. The objective of the MCC structure is to provide a framework for comparing goods exported to Australia with similar like goods sold on an exporter's domestic market.⁵ This process is commonly referred to as 'model matching'.

Model matching assists the Commission to assess whether dumping has occurred and is a useful way to ensure that the normal value is properly comparable with the export price.

In determining an MCC structure for any given case, the Commission will have regard to differences in physical characteristics that give rise to distinguishable and material differences in price.

In the original investigation (REP 238) the Commission found that the goods and like goods vary in a number of different ways, and that there were many physical characteristics influencing prices. There were also different consumer preferences on the Australian and Chinese markets. The above factors limited the Commission's ability to identify sales of like goods that would be relevant for the purpose of determining a price under subsection 269TAC(1). The Commission considers it is likely that similar issues will be present in this inquiry. As a result, the Commission has elected not to propose an MCC structure at the outset of this inquiry. However, information gathered in responses received from importers and exporters, and from the Australian industry, will be examined to assess if an appropriate MCC structure can be developed.

Proposals about the MCC structure should be raised as soon as is practicable, but no later than **9 August 2019**, the day submissions concerning the continuation of the measures are due.

If an MCC structure is developed interested parties will have an opportunity to discuss the structure and propose modifications. Any changes to the MCC structure will be considered by the Commission and reported in verification reports or in the statement of essential facts (SEF).

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.

Response: In question 2 below, the Commission has requested for detailed information concerning the products exported by Primy to Australia. Please refer to Confidential Exhibit C-1-2.

⁵ Full guidance regarding the Commission's application of an MCC structure is provided at section 14 of the Anti-Dumping Commission *Dumping and Subsidy Manual* which is available at www.industry.gov.au.

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2. Complete the confidential worksheet named "C-1 The Goods" to provide a list of all **goods** exported to Australia identified by a relevant product or model code and report for each code the relevant characteristics summarised below;

This must cover all goods listed in the Australian sales listing in B-2.

- Stainless Steel Grade
- Material Gauge (millimetre or "mm")
- Finish
- Total Capacity of all bowls (litres or "L")
- Total number of bowls
- Capacity of the largest bowl
- Capacity of additional bowls
- Number of drainer boards
- Bowl corner radius
- Included accessories

Response: Please refer to Confidential Exhibit C-1.

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.

Response: In question 2 below, the Commission has requested for detailed information concerning the products sold by Primy in the domestic market. Please refer to Confidential Exhibit C-2-2.

2. Complete the confidential worksheet named "C-2 Like Goods" to provide a list of all **like goods** sold on your domestic market identified by a relevant product or model code and report for each code the relevant characteristics summarised below;

This must cover all listed in the Domestic sales listing in D-2.

- Stainless Steel Grade
- Material Gauge (millimetre or "mm")
- Finish
- Total Capacity of all bowls (litres or "L")
- Total number of bowls
- Capacity of the largest bowl
- Capacity of additional bowls
- Number of drainer boards
- Bowl corner radius
- Included accessories

Response: Please refer to Confidential Exhibit C-2-2.

C-3 Internal product codes

3. Does your company use product codes or stock keeping unit (SKU) codes?

- (a) Provide details of the product or SKU coding system for the goods and like goods at worksheet "C-3 SKU", illustrate the meaning for each code within the product or SKU code.

Response: Primy's internal product codes are mostly sequel numbers, and only the first digit(s) carry specific meanings classifying products. Please refer to Confidential Exhibit C-3, in which Primy provides the meanings of the first digit(s) of its product codes for the goods and like goods.

- (b) Provide details on how you mapped the product or SKU codes to the product codes listed in response to C-1 and C-2 for the purpose of completing this questionnaire.

Response: Each of Primy's product code reflects a unique combination of specific sinks, which has its own gauge, finish, number of bowls, bowl capacity and whether there is and how many drainer board, and types of accessories included together with the sink.

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
 - (b) Price determination and/or negotiation process
 - (c) Order placement process
 - (d) Order fulfilment process and lead time
 - (e) Delivery terms and process
 - (f) Invoicing process
 - (g) Payment terms and process

Response:

There are four following distinct channels of distribution to the domestic customers by Primy:

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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.

Response: Among other Primy's domestic customers, [REDACTED]

[REDACTED].

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

Response: Primy has price list [REDACTED]

[REDACTED]. Please refer to Confidential Exhibit D-1-3 sample page of the price lists.

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.

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Response: Please refer to the detailed explanation in response to question D-1.

[REDACTED]

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.

Response: Primy provides discounts to certain customer in relation to the sale of the like goods during the period. If the customers meet certain purchase target in a year, at the beginning of the next year, Primy will provide discount to the customers based on the purchase value in the previous year.

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.

Response: Primy issued some credit or debit notes to the customers during the period. The reason for the credit notes are for return of products. Primy has reported such credit notes in Confidential Exhibit D-2 Domestic Sales Listing.

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?

Response: Primy does not claim a different date of sale other than the invoice date.

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 B-1.8 and/or 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.

Response: Please refer to Confidential Exhibit D-2.

For some of the sales, Primy issued invoice for a combination of sinks and other products, mainly faucets, and sinks are these other products are sold for a single price. For such sales, Primy has added columns in the table titled "other products 1", "other products 2" etc.

Primy issued some credit notes which either corrected a previously issued invoice with errors, or reflect return of products by customers. Primy has added a few columns in Exhibit D-2, and reported the credit note in the same line of the original invoice to which they relate.

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

Response: Please refer to Confidential Exhibit D-2-2.

D-3 Sample domestic sales documents

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

- (a) Contracts
- (b) Purchase order and order confirmation
- (c) Commercial invoice and packing list
- (d) Proof of payment and accounts receivable ledger
- (e) Documents showing bank charges
- (f) Delivery invoices

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

Response: Please refer to Confidential Exhibit D-3-1.

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

Response: Please refer to Confidential Exhibit D-3-1

D-4 Reconciliation of sales to financial accounts

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

Response: Primy has completed B-4 and therefore not responding to this section.

1. Please complete the worksheet named "B-4 Upwards sales" to demonstrate that the sales listings in 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, other than those in A-4, D-2 and F-2, required to complete the "B-4 Upwards sales" worksheet. If the documents include spreadsheets, all formulas used must be retained.
3. For any amount in the "B-4 Upwards sales" worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
 - (a) the name of the source document, including the relevant page number, in column D of the worksheet; and
 - (b) highlight or annotate the amount shown in the source document.

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:
 - Calculate the accounts receivable turnover for each domestic customer (credit sales divided by the average accounts receivable).
 - Calculate the average credit term for each domestic customer by dividing 365 by the accounts receivable turnover
 - (b) Do you have short term borrowings or an overdraft facility? If yes, what is the interest rate, or average of interest rates?
 - (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?

Response: For certain domestic customers, Primy provides some credit terms for payment. The payment terms for each customer in domestic market have been reported in the sales list. Primy does not provide rolling credit facility to domestic customers.



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

Response: For certain Australian customers, Primy provides some credit terms for payments. Primy does not provide rolling credit facility to Australian customers.
3. If your Australian customers pay you into a foreign currency denominated account (question B-1.2(a) refers):
 - (a) 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?
 - (b) 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?

Response: Australian customers mostly pay Primy in [REDACTED]

[REDACTED] Primy did not have term deposit or other cash products.

E-2 Packaging

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

Response: Primy normally uses carton package or pallet package for domestic sales of like goods. The specific package would depend on the requirement of the customers.

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

Response: Primy normally uses carton package or pallet package for export sales of the goods to Australia. The specific package would depend on the requirement of the customers.

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

Response: There is no distinct difference in packing between Primy's domestic and export sales.

4. Calculate the weighted average packaging cost for each model exported to Australia

Response: Primy does not separately calculate package costs for models in its normal business.

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?

Response [REDACTED]

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

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Response: Export sales to Australia are mostly on [REDACTED] basis, and for limited instances on [REDACTED] basis.

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?

Response: Primy relied on transaction-specific expense incurred and allocated the total expenses for an invoice to the different products in the invoice based on the value of different products, and reported them in B-2.

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?

Response: Delivery terms of Primy's Australian sales during the POI did not include ocean freight.

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

Response: Delivery terms of Primy's Australian sales during the POI did not include marine insurance.

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?

Response: Delivery terms of Primy's Australian sales during the POI did not include delivered duty paid.

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.

Response: Primy does not provide sales commissions for domestic sales of like goods. [REDACTED]

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

- What is the rate of value-added tax (VAT) on sales of the goods and like goods?
- What is the rate of VAT rebate applicable to your exports of the goods?
- Is the rate of VAT rebate identical for each tariff subheading under which you exported the goods? If NO, please detail for each tariff subheading.
- How is VAT accounted for in your records in relation to sales of the goods and like goods?
- Do you receive a VAT refund in relation to sales of the goods and/or like goods?
- Do you receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods?

Response: From July 2018 to March 2019, the VAT on sales of the goods and like goods are 16%. From April 2019 to June 2019, the VAT on sales of the goods and like goods are 13%. From July 2018 to Oct 2018, the VAT rebate to exports of the goods is 9%. From November 2018 to June 2019, the VAT rebate increased to 13%. The VAT rebate is identical for each tariff subheading under which Primy exported the goods. Therefore, the non-refundable VAT rate from July 2018 to Oct 2018 is 7%, from Nov 2018 to March 2019 is 3% and from April 2019 to June 2019 is 0.

VAT is recorded in the accounting system. Primy could receive VAT refund for its exports. Primy did not receive remission or drawback of import duty on inputs consumed in the production of the goods or like goods.

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

Response: For sales to one customer, Primy needs to pay an intermediate company for the sales made to the customer. Primy has reported such expenses as "Other expenses".

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

4. 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

Response: There is none, except for those already reported in Australian Sales Listing.

E-5 Other adjustment claims

5. 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 15 of the Dumping and Subsidy Manual (November 2018) for more information.

Response:

[REDACTED]

[REDACTED]

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[REDACTED]

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.

Response: Primy's sale process to third countries is similar to that described in response to B-1.1.

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.

Response: There is no third country customers that are related to Primy. In some instances during the inquiry period, for its exports to Australia, Primy issued invoices to Primy Trading (HK) Limited, a related company as reported above located in HongKong

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?

Response: Primy does not claim a date of sale other than the invoice date.

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.

Response: Please refer to Confidential Exhibit F-2.

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

Response: Please refer to Confidential Exhibit F-2-2.

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.

Response:

The product models sold to third countries are not the same models as those sold to Australia and therefore not comparable.

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.

Response: Please refer to Confidential Exhibit G-1-1.

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.

Response: The suppliers are not related to Primy.

G-2 Cost accounting practices

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

Response: Primy's cost accounting system is based on actual costs.

2. If your 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.

Response: Primy does not use standard costs and therefore this question is 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.

Response: Primy has several cost centres in the cost accounting system.

[REDACTED]

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

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Response: Primy's cost accounting system allocate and record production costs to the specific product codes.

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

Response: There is no such situation.

6. Has your company engaged in any start-up operations in relation to the goods? If yes:
- (a) Describe in detail the start-up operation giving dates (actual or projected) of each stage of the start-up operation.
 - (b) 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.

Response: Primy did not engage in start-up operation.

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)?

Response: Primy used weighted average methodology.

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

Response: Primy does not have damaged or sub-standard goods. Goods not up to the normal standard would either be scrap or repaired to be quality goods.

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

Response: There is no costs allocated to scraps. There is no by product or joint product.

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

Response: There is no such situation.

G-3 Cost to make on domestic market

1. Complete the worksheet named "G-3 Domestic CTM".
- This worksheet lists the quarterly cost to make the domestic models of like goods manufactured within the period, even if some models are not like to those exported to Australia.
 - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) and preferably aggregated on a quarterly basis for each like good (model) that was sold on the domestic market. However, the Commission may accept costs which are aggregated on a different basis so long as those costs can be mapped to the various models reported in the domestic sales listing at worksheet

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"D-2 Domestic Sales". If an alternative method of reporting is selected please ensure the costs are reported at quarterly intervals.

- 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.
- If you have used formulas to complete this worksheet, these formulas must be retained.
- If you have claimed in B-1.8 and/or D-1.7 that the date of sale is one other than the invoice date, then provide the cost for the quarters that all domestic sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.

Response: Please refer to Confidential Exhibit G-3.

2. Provide a table listing the source of the data for each column of the "G-3 Domestic CTM" listing.

Response: The source of all the data in G-3 is the cost sheets of Primy

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.

Response: Please refer to Confidential Exhibit G-4-1.

2. Complete the worksheet named "G-4.2 Domestic SG&A calculation".

- This worksheet calculates the unit domestic SG&A for each product identified in the cost to make data at worksheet "G-3 Domestic CTM".
- You must provide this list in electronic format using the template provided.
- Please use the formulas provided.

Response: Please refer to Confidential Exhibit G-4-2.

G-5 Cost to make the goods exported to Australia

1. Complete the worksheet named "G-5 Australian CTM".

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- This worksheet lists the quarterly cost to make the Australian models of the goods under consideration manufactured within the period.
- The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) and preferably aggregated on a quarterly basis for each good (model) that was exported. However, the Commission may accept costs which are aggregated on a different basis so long as those costs can be mapped to the various models reported in the Australian sales listing at worksheet "B-2 Australian Sales". If an alternative method of reporting is selected please ensure the costs are reported at quarterly intervals.
- 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 quarters 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.

Response: Please refer to Confidential Exhibit G-5.

2. Provide a table listing the source of the data for each column of the "G-5 Australian CTM" listing.

Response: The source of all the data in G-5 is the cost sheets of Primy,

G-6 Cost allocation methodology

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

Response: Primy followed the cost allocation methodology in its normal business in reporting the G-3 domestic CTM and G-5 Australian CTM.

2. Select the domestic model (export model if you have no domestic production of like goods) with the largest production volume 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.

Response: Please refer to Confidential Exhibit G-6-2. There are no goods sold in the domestic market that are similar to the goods exported to Australia. Therefore, Primy has selected the product code with the largest production volume over the period.



G-7 Major raw material costs

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

Response: The major raw material used in the manufacturing of the goods is stainless steel.

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, complete the worksheet named "G-7.2 Raw material CTM" for these raw materials.
 - This worksheet lists the quarterly cost to make the raw material manufactured within the period.
 - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold).
 - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the raw material, 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.

Response: Primy does not have purchase of raw materials used in the production of the goods from a subsidiary company, therefore this question is not applicable.

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

Response: The average proportion of stainless steel, as reported in G-7.1, of the total cost to make, is around █%.

4. For each raw material identified in G-7.3 which individually account 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.

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- 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.

Response: Please refer to Confidential Exhibit G-7-4.

5. Provide a table listing the source of the data for each column of the "G-7.4 Raw material purchases" listing.

Response: The source for all the data in Confidential Exhibit G-7-4 is the purchase invoice, except that for "Manufacturer".

6. For each raw material:

- (a) Select the two largest invoices by value and provide the commercial invoice and proof of payment.
- (b) Reconcile the total value listed in "G-7.4 Raw material purchases" listing to relevant purchase ledgers or trial balances in your accounting system. Provide copies of all documents used to demonstrate the reconciliation.

Response: Please refer to Confidential Exhibit G-7-6-1 the purchase invoices and proof of payments. The reconciliation of the payment with the invoices are marked on the documents.

Please refer to Confidential Exhibit G-7-6-2 the raw material purchase reconciliation with raw material ledger.

7. Are any of the suppliers in "G-7.4 Raw material purchases" listing related to your company? If yes, please provide details on how the price is set.

Response: None of the suppliers listed in Confidential Exhibit G-7-4 is related to Primy.

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

1. Please complete the worksheet named "G-8 Upwards costs" to demonstrate that the cost listings in G-3 and G-5 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.

Response: Please refer to Confidential Exhibit G-8.

2. Please provide any documents, other than those in A-4, G-3 and G-5, required to complete the "G-8 Upwards costs" worksheet.

Response: The source documents have been listed in Confidential Exhibit G-8.

3. For any amount that is hard coded (i.e. not a formula), please cross-reference by providing:
 - (a) the name of the source document, including the relevant page number, in column D of the worksheet; and
 - (b) highlight or annotate the amount shown in the source document.

Response: The source documents have been listed in Confidential Exhibit G-8.

G-9 Capacity Utilisation

1. 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.

Response: Please refer to Confidential Exhibit G-9.

SECTION H COUNTERVAILING

[Not Applicable to Primy as the Countervailing Investigation in relation to Primy was terminated by the Anti-Dumping Commissioner in the original investigation.]

In REP 238, the Commission found that countervailable subsidies had been received by exporters of the goods in relation to 23 subsidy programs. In the absence of GOC advice regarding the individual enterprises that had received financial contributions under each of the investigated subsidy programs, the Commissioner had regard to the available relevant facts and determined that uncooperative exporters had received financial contributions conferring a benefit under all 23 programs found to be countervailable in relation to the goods.

In *Review of Measures No. 461* the Commission identified five additional subsidy programs that were not previously investigated but were however found to be countervailable in relation to the export of the goods to Australia. As a result the following 28 subsidy programs listed in the table below are being investigated during this inquiry.

Category	Program Number ⁶	Program Name
Provision of goods	Program 1	Raw Materials Provided by the Government at Less than Fair Market Value
Grant	Program 2	Research & Development (R&D) Assistance Grant
Grant	Program 3	Grants for Export Activities
Grant	Program 4	Allowance to pay loan interest
Grant	Program 5	International Market Fund for Export Companies
Grant	Program 6	International Market Fund for Small and Medium-sized Export Companies
Income Tax	Program 8	Tax preference available to companies that operate at a small profit
Grant	Program 9	Award to top ten tax payer
Grant	Program 10	Assistance to take part in overseas trade fairs
Grant	Program 11	Grant for management certification
Grant	Program 12	Grant for certification of product patents
Grant	Program 13	Grant for inventions, utility models and designs
Grant	Program 14	Grant for international marketing
Grant	Program 15	Subsidy to electronic commerce
Grant	Program 16	Grant for overseas advertising and trademark registration
Grant	Program 17	Grant for overseas marketing or study
Grant	Program 18	Gaolan Port Subsidy

⁶ Program numbers 1 to 24 are the same as those investigated in REP 238. In REP 461 the additional marked programs were identified in relation to the export of the goods.

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Category	Program Number ⁶	Program Name
Grant	Program 19	Information development subsidy
Grant	Program 20	Foreign Trade Exhibition Activity Fund
Grant	Program 21	Zhuhai Technology Reform & Renovation Fund
Grant	Program 22	Zhuhai Support the Strong Enterprise Interests Subsidy
Grant	Program 23	Zhuhai Research & Development Assistance Fund
Income tax	Program 24	Preferential Tax Policies for High and New Technology Enterprises
Grant	Program 26*	Foreign Trade Fund
Grant	Program 27*	Technology Innovation
Grant	Program 28*	Higher-New Technology Enterprise
Grant	Program 29*	Patent Grant
Grant	Program 30*	Patent Grant Special Fund

Table H-1

H-1 General

1. Complete the worksheet named "H-1 Company turnover"
 - This worksheet is a table of the total company revenue over the period and split into:
 - Total revenue for Australian sales, domestic sales and third country sales
 - Revenue of the goods for Australian sales, domestic sales and third country sales
 - You must provide this table in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

H-2 Provision of goods at less than adequate remuneration (Program 1)

In the original investigation (*Investigation No.238*), the Commission found that Chinese exporters of the goods benefited from the provision of raw materials in the form of 304-grade cold rolled 304 stainless steel coil (304 SS CRC) by the Government of China at less than adequate remuneration. In the original investigation this subsidy is referred to as Program 1.

1. Complete the worksheet named "G-7.4 Raw Material Purchases" to report your purchases of stainless steel cold rolled coil during the inquiry period, including all coil imported from foreign suppliers.
2. Did your business receive any reduction/reduced price for the purchase of these goods/services during the investigation period/review/inquiry? If so, describe the eligibility criteria that your business had to meet in order to qualify for any reduction in the price paid for the goods/services.

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3. Provide copies of all contractual agreements that detail the obligations of the State Invested Enterprise (SIE) and your business with reference to the granting and receipt of the assistance/benefits.
4. If your business purchased imported raw materials, explain the reason/s for your business' decision to purchase imported over domestic raw materials, including the key factors affecting the decision such as price, availability etc.

H-3 Preferential tax policies (Program 8 and 24)

1. Complete the worksheet named "H-3 Income Tax"
 - This worksheet is a table of your company's income tax liability over the last three financial years.
 - You must provide this table in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
2. Provide a copy of your company's annual tax return for the last three financial years. If the documents are not in English, please provide a translation of the documents.
3. Provide proof of your company's tax payments to your tax authority over the last three financial years, including any progress payments made and related forms submitted to reconcile the annual tax return.
4. What is the general tax rate for enterprises (also referred to as the company or corporate tax rate) during the previous two financial years?
5. Did your company pay less than the general tax rate for enterprises referred to in question H-3.4?
If yes:
 - (a) What tax rate did your company pay?
 - (b) Was the reduction in the tax paid or payable related to any of the preferential income tax programs in the table at the top of Section H Countervailing above?
 - (c) What is the name of the authority granting your company the reduced tax rate?
 - (d) What is the eligibility criteria to benefit from the reduced tax rate?
 - (e) Provide details of the application process
 - (f) Provide a copy of the blank application form. If the documents are not in English, please provide a translation of the documents.
 - (g) Provide a copy of your company's completed application form, including all attachments to the application form. If the documents are not in English, please provide a translation of the documents.

- (h) Provide a copy of any confirmation or other correspondence from the authority approving your company for the reduction in tax rate. If the documents are not in English, please provide a translation of the documents.
- (i) Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.

H-4 Financial grants (All other programs not covered by H-2 and H-3)

1. Complete the worksheet named "H-4 Grants"
 - This worksheet is a table of the grants in relation to those listed at Table H-1 (or any other financial contribution) received by company over the inquiry period plus the two preceding years.
 - You must provide this table in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
2. Provide a copy of your company's non-operating income and/or other business income ledgers, extracted directly from your accounting system, for the period covering the period plus the 2 preceding years.
3. Did your company receive any grants in relation to those listed at Table H-1 (or any other financial contribution) from any level of government during the period plus the two preceding years?
If yes:
 - (a) Were any of the grants related to any program listed in Table H-1? If yes, identify the program.
 - (b) Were any of the grants related to programs not listed in Table H-1? If yes, provide the names of the programs.
4. For each of the grants listed in H-4.3:
 - (a) What is the name of the grant if not already listed in Table H-1?
 - (b) What is the name of the authority providing the grant?
 - (c) What is the eligibility criteria to receive the grant?
 - (d) Is the grant directly related to the goods under consideration, export sales to Australia and/or export sales generally?
 - (e) Provide details of the application process.
 - (f) Provide a copy of the blank application form. If the documents are not in English, please provide a translation of the documents.
 - (g) Provide a copy of your company's completed application form, including all attachments to the application form. If the documents are not in English, please provide a translation of the documents.

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- (h) Provide a copy of any confirmation or other correspondence from the authority approving the grant. If the documents are not in English, please provide a translation of the documents.
- (i) Provide proof of payment of your company receiving the grant (e.g. bank statements).
- (j) Provide a copy of the accounting journal entries relating to the grant.
- (k) Outline the fees charged to, or expenses incurred by your business for purposes of receiving the grant.

H-5 Other Programs not listed in Table H-1

1. Provide a list of all the provinces in which you have business operations (including locations of factories, sales offices, or other places of business).
2. Are you aware of any programs of the Government of China, any of its agencies or any other authorised body, that benefits manufacturers of the goods that have not been accounted for in this questionnaire? Provide the name of those programs you are aware of (even if your company is not eligible to receive benefit under the program.)
3. Indicate the location of the program by region, province or municipal level.
4. Indicate the type of program, for example:
 - the provision of grants, awards or prizes;
 - the provision of goods or services at a reduced price (e.g. electricity, gas, transport);
 - the reduction of tax payable including income tax and VAT;
 - reduction in land use fees;
 - loans from Policy Banks at below-market rates; or
 - any other form of assistance.

For **each program** that you have identified, answer the following.

5. Indicate whether your company benefited from any of the listed programs during the period.
6. Indicate which goods you produced that benefited from the program (e.g. the program may have benefited all production or only certain products that have undergone research and development).
7. Describe the application and approval procedures for obtaining a benefit under the program.

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8. Where applicable, provide copies of the application form or other documentation used to apply for the program, all attachments and all contractual agreements entered into between your business and the Government of China in relation to the program.
9. Outline the fees charged to, or expenses incurred by your business for purposes of receiving the program.
10. Outline the eligibility criteria your business had to meet in order to receive benefits under this program.
11. State whether your eligibility for the program was conditional on one or more of the following criteria:
 - (a) whether or not your business exports or has increased its exports;
 - (b) the use of domestic rather than imported inputs;
 - (c) the industry to which your business belongs; or
 - (d) the region in which your business is located.
12. If the benefit was provided in relation to a specific activity or project of your entity, please identify the activity and provide supporting documentation.
13. What records does your business keep regarding each of the benefits received under this program? Provide copies of any records kept in relation to the program.
14. Indicate where benefits under this program can be found in your accounting system (i.e., specify the ledgers or journals) and financial statements.
15. To your knowledge, does the program still operate or has it been terminated?
16. If the program has been terminated, please provide details (including when and why). When is the last date that your business could apply for or claim benefits under the program? When is the last date that your business could receive benefits under the program?
17. If the program terminated has been substituted for by another program, identify the program and answer all the questions in Part H-4 in relation to this program.

EXPORTER'S DECLARATION

I hereby declare that.....(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 :

Signature :

**Position in
Company** :

Date :

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.

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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

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

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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) the terms CFR and CIF are only used where goods are carried by sea or waterway transport
CPT	carriage paid to
CIP	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 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.