



## Exporter Verification Report

### Verification & Case Details

<b>Initiation Date</b>	529 - 25/10/2019 532 – 15/11/2019	<b>ADN:</b>	529 - 2019/132 (Review) 532 – 2019/141 (Continuation)
<b>Case</b>	529 - Hollow Structural Sections - Review of Measure - China, Korea, Taiwan, Malaysia, Thailand 532 - Hollow Structural Sections – Continuation Inquiry – Thailand		
<b>Case Number</b>	529 – Review of Measures 532 – Continuation Inquiry		
<b>Exporter</b>	Saha Thai Steel Pipe Public Co., Ltd.		
<b>Location</b>	Desktop Verification		
<b>Review Period</b>	1 October 2018 <b>to</b> 30 September 2019		

THIS REPORT AND THE VIEWS OR RECOMMENDATIONS CONTAINED THEREIN  
 WILL BE REVIEWED BY THE CASE MANAGEMENT TEAM AND MAY NOT REFLECT  
 THE FINAL POSITION OF THE ANTI-DUMPING COMMISSION

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## 1 COMPANY BACKGROUND

### 1.1 Corporate Structure and Ownership

Saha Thai Steel Pipe Public Co., Ltd. (Saha Thai) is a privately owned company involved in the production and sale of hollow structural sections (HSS or like goods) which it sells domestically in the Kingdom of Thailand (Thailand) and to export markets including Australia.

### 1.2 Related Parties

The verification team examined the relationships between Saha Thai and parties involved in the manufacture and sale of the goods.

The verification team found that Saha Thai did not have any related party suppliers during the inquiry period. There were however related party customers of the goods:

#### 1.2.1 Related customers

Related party sales were identified:

- Bangkok Barge Terminal Co., Ltd.
- Bangkok Container Depot Service Co., Ltd.
- Saha Thai Property & Development Co., Ltd.
- Saha Thai Terminal Public Co., Ltd.
- Sripoonsup Enterprise Co., Ltd.
- Sripoonthong Co., Ltd.

The arm's length nature of these transactions are considered at section 8.1.

#### 1.2.2 Accounting records

Saha Thai's annual financial statements were audited and include a statement that the financial accounts comply with Thai Financial Reporting Standards (TFRS).

Therefore, the verification team considers that the accounting records held by the company are in accordance with the generally accepted accounting principles of Thailand.

## **2 THE GOODS AND LIKE GOODS**

### **2.1 Production Process**

Saha Thai first purchases hot rolled coil (HRC) steel (black or pre-galvanised), which is then slit onsite into smaller coils. The slit coil is loaded into the production line, unrolled, and passed through a series of rolling mills to achieve the desired profile.

The open profile then undergoes ERW welding to close the profile, with cutting of the section completing production of HSS. The HSS may then be further processed with zinc galvanising, painting or oiling.

Subsequent to production, goods are bundled, packaged, and stored in inventory. Product is then despatched according to agreed terms with customers.

### **2.2 Model Control Codes (MCCs)**

Saha Thai provided sales and cost data in its response to the exporter questionnaire in accordance with the model control code (MCC) structure detailed in ADN 2019/132.

No.	Exception	Resolution
1	Subcategory 'G' assigned to a selection of items in sales listing (Domestic sales D-2). This was thought to be possibly an erroneous duplication of galvanisation, however it does not uniformly align to the actual galvanisation column.	The 'G' pertaining to the 'ends' category was removed from the domestic sales listing by the verification team, to be consistent with the MCC format. The verification team did not ask Saha to amend this data because the 'ends' category is an optional MCC category.

**Table 1: Exception regarding MCC classification**

#### **2.2.1 Amendments to MCCs**

Saha Thai did not provide a description of this end type. Based on analysis of the price comparability of the goods under consideration, the verification team considers it is not necessary to make amendments to the MCC structure.

### **2.3 Verification of MCCs**

Table 1 below provides detail on how the MCC sub-categories were determined and verified to source documents.

Category	Determination of the sub-category
Dimensions	Based on the nominal width, height, diameter, thickness or length shown on the commercial invoices and purchase orders.
Weight	Based on theoretical weight on purchase order and commercial invoices.
Yield Strength	Based on the standard and grade shown on the commercial invoices. Table 2 below outlines how the standard/grade is mapped to the yield strength.
Prime	Based on product name in commercial invoices.
Shape	Based on product descriptions and dimensioning on commercial invoices and purchase orders.

<b>Category</b>	<b>Determination of the sub-category</b>
End	Based on any additional product descriptions on commercial invoices and purchase order where applicable (i.e. not plain).
Galvanised	Based on galvanisation description on commercial invoices where applicable (i.e. not non-galvanised).
Finish	Based upon additional product descriptions on commercial invoices and purchase orders where applicable (i.e. not black).

**Table 2: MCC sub-category determination**

## **2.4 The goods exported to Australia**

The verification team were satisfied that Saha Thai produced and exported like goods to Australia. Saha Thai exported like goods to Australia with the following MCCs during the review and inquiry period:

- P-N-O-R-350-P;
- P-N-P-R-350-P;
- P-N-N-R-350-P;
- P-N-P-C-250-P;

## **2.5 Like goods sold on the domestic market**

The verification team were satisfied that Saha Thai sold like goods in the domestic market.

The verification team considers that the goods manufactured for domestic consumption are identical to, or have characteristics closely resembling, the goods exported to Australia.

### **2.5.1 Physical Likeness**

- shapes and profiles sold in the domestic market are the same as those sold and offered to the Australian market;
- dimensions of HSS products were of similar perimeter, diameter, length and thickness to those sold to Australia; and
- coatings and finishes are similar to those exported to Australia;

### **2.5.2 Production Likeness**

- based upon the production process outlined by Saha Thai, goods sold domestically undergo the same production processes as those exported to Australia;
- regardless of destination market, forming and processing procedures are similar; and
- the same base raw material feed (HRC) is used.

### **2.5.3 Commercial Likeness**

- the sales process for domestic customers is similar to the sales process for Australian customers of the like goods;
- Saha Thai negotiates directly with customers by setting sales and delivery terms prior to production; and
- like goods are sold to similar domestic and Australian downstream industries in manufacturing and construction.

#### 2.5.4 Functional Likeness

- goods domestically are used for similar purposes including construction and fabrication; and
- domestic goods are completely interchangeable with Australian goods, with goods substitutable as long as key characteristics are the same (painting, end-types, steel strength).

Saha Thai sold like goods on the domestic market with the following MCCs during the period:

- P-N-P-C-250-P
- P-N-P-C-250-C
- P-N-N-R-250-P
- P-N-N-C-250-P
- P-G-N-C-250-P
- P-G-N-C-N-T
- P-G-N-C-250-C
- P-N-P-C-250-T
- P-G-N-C-N-P
- P-N-N-R-N-P
- P-G-N-C-250-T
- P-N-P-C-250-G
- P-N-N-C-N-P
- P-N-P-R-350-P
- P-N-P-C-N-T
- P-G-N-R-N-P
- P-G-N-C-250-G
- N-N-N-C-N-C
- P-N-O-R-350-P
- P-N-N-R-350-P
- P-N-N-C-N-C
- P-N-O-C-250-P

#### 2.6 Like goods – assessment

The verification team considers that the goods produced by Saha Thai for domestic sale have characteristics closely resembling those of the goods exported to Australia and are therefore 'like goods' in accordance with section 269T(1) of the *Customs Act 1901* (the Act).<sup>1</sup>

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<sup>1</sup> References to any section or section in this report relate to provisions of the Act, unless specifically stated otherwise.

### 3 VERIFICATION OF SALES COMPLETENESS AND RELEVANCE

Verification of relevance and completeness is conducted by reconciling selected data submitted "upwards" through management accounts up to audited financial accounts. The total sales value and quantity is reconciled to management reports with particular attention given to ensuring that all relevant transactions are included and irrelevant transactions are excluded. The total value from the management reports is then reconciled to the total revenue figure reported in the audited income statement.

The verification team verified the completeness and relevance of the export and domestic sales listings provided in the Response to the Exporter Questionnaire (REQ) by reconciling these to audited financial statements with regard to ADN No 2016/30.

- reconciled financial year revenue in the trial balance to the 2018 audited financial statement;
- reconciled the review/inquiry period revenue stated in the reconciliation with the review/inquiry period revenue stated in the trial balance and also to the financial statement;
- reviewed accounts in trial balance and chart of accounts to ensure completeness of sales revenue; and
- reconciled the Australian export sales list and domestic sales list with Saha Thai's sales ledgers.

The verification team did not identify any issues during this process. Details of this verification process are contained in the verification work program and its relevant attachments at **Confidential Attachment 1**.

#### 3.1 Exceptions during verification of sales completeness and relevance

No.	Exception	Resolution
1	Saha Thai included one export sale of CHS with diameter < 21 mm in its Australian export sales listing.	The verification team classified the HSS in this transaction as not being the like goods. The inclusion of the sale had an immaterial effect on the upwards sales reconciliation.
2	Saha Thai included a significant portion of domestic sales of CHS with diameter < 21mm and > 165.1mm in its domestic sales listing.	The verification team reclassified the value and quantity of these sales in the upwards sales reconciliation and was satisfied that the domestic sales list was complete and accurate.

**Table 3: Exceptions during verification of completeness and relevance of sales data**

#### 3.2 Sales completeness and relevance finding

The verification team is satisfied that the sales data provided by Saha Thai is complete and relevant.

## **4 VERIFICATION OF SALES ACCURACY**

The accuracy of data is verified by reconciling selected data submitted "downwards" to source documents. This part of verification involves the process of agreeing the volume, value and other key information fields within the sales data down to source documents. This verifies the accuracy of the data.

The verification team verified accuracy of the export and domestic sales listings submitted in the REQ by reconciling these to source documents with regard to ADN No 2016/30.

The verification team identified the issues outlined below during this process. Details of this verification process are contained in the verification work program and its relevant attachments, at **Confidential Attachment 1**.

### **4.1 Exceptions during verification of sales accuracy**

No.	Exception	Resolution
1	Saha Thai excluded payment days for some domestic sales in its domestic sales list.	The verification team calculated the weighted average payment days from the information provided and substituted this value for the missing data.
2	Saha Thai excluded payment days for all of its export sales in its Australian sales list.	The verification team received payment evidence demonstrating the payment days for the downwards sales samples. As the samples had different payment days, the verification team made a substitution for the blank payment days in the data based on what it believed was a reasonable time frame for export sales to Australia.

**Table 4: Exceptions during verification of accuracy of sales data**

### **4.2 Sales accuracy finding**

The verification team is satisfied that the sales data provided by Saha Thai, including any required amendments as outlined in the exception tables above, is accurate. Details of this verification process are contained in the verification work program and its relevant attachments, at **Confidential Attachment 1**.



<b>5 VERIFICATION OF COST TO MAKE AND SELL (CTMS) COMPLETENESS AND RELEVANCE</b>
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Verification of relevance and completeness is conducted by reconciling selected data submitted "upwards" through management accounts up to audited financial accounts. The total cost to make data is reconciled to the cost of production in the management reports with particular attention given to ensuring that all relevant costs are included and irrelevant costs have been excluded. The cost of production data is then reconciled, through relevant account ledgers, to the cost of goods sold figure reported in the audited income statement. Additionally, selling, general and administration (SG&A) expenses are reconciled to income statements, with particular attention given to specific expenses that were excluded or should be excluded.

The verification team verified the completeness and relevance the cost to make and sell (CTMS) information provided in the REQ by reconciling it to audited financial statements with regard to ADN No 2016/30.

The verification team verified the relevance and completeness of the cost data as follows:

- reconciled financial year costs in the trial balance to the 2018 audited financial statement;
- reconciled the review/inquiry period cost stated in the reconciliation with the review/inquiry period costs stated in the trial balance and also to the financial statement;
- reviewed accounts in trial balance and chart of accounts to ensure completeness of cost; and

The verification team verified the relevance and completeness of the SG&A data as follows:

- reconciled declared SG&A expenses to trial balance;
- reviewed accounts in the trial balance and chart of accounts to ensure completeness of SG&A expenses; and
- reconciled SG&A accounts and management reports to the 2018 audited financial statement and for the review/inquiry period.

The verification team identified the issues outlined below during this process. Details of this verification process are contained in the verification work program and its relevant attachments, at **Confidential Attachment 1**.

### **5.1 Exceptions during verification of completeness and relevance of CTMS data**

No.	Exception	Resolution
1	Saha Thai included warehouse rental revenue in its SG&A calculation that appeared to be a separate revenue stream.	As this revenue was separately listed in Saha Thai's financial statement they are not related to the domestic sale of like goods and the verification team removed from Saha Thai's SG&A calculation.
2	The verification team observed that the domestic SG&A calculation was based on the domestic sales list that included non-like goods of CHS with diameter < 21mm and > 165.1mm.	The verification team recalculated unit SG&A per domestic MCC by excluding CHS with diameter < 21mm and > 165.1mm.

**Table 5: Exceptions during verification of completeness and relevance of CTMS data**

## **5.2 Completeness and relevance finding of CTMS data**

The verification team is satisfied that the CTMS data provided in the exporter questionnaire response by Saha Thai, including any required amendments as outlined as an exception above, is complete and relevant.

## 6 VERIFICATION OF COST TO MAKE AND SELL (CTMS) ACCURACY

### 6.1 Cost allocation method

The verification team verified the reasonableness of the method used to allocate the cost information provided in the REQ to the relevant MCCs, with regard to ADN No. 2016/30.

The verification team did not identify any issues during this process. Details of this verification process are contained in the verification work program and its relevant attachments, at **Confidential Attachment 1**.

Table 6 below outlines the allocation method applied to each cost item.

Cost item	Method applied
Raw Materials	Raw material costs are allocated to the GUC based on production quantity.
Manufacturing Overheads	Manufacturing overhead costs are based upon actual expenses. Allocated to the GUC based on production quantities.
Labour	Labour material costs are based upon actual expenses. Allocated to the GUC based on production quantities.
Variance	Allocated proportionally amongst GUC and non-GUC by revenue.

Table 6: Cost allocation method

### 6.2 Exceptions during verification of CTMS allocation method

No.	Exception	Resolution
1	Nil	N/A

Table 7: Exceptions during verification of CTMS allocation method

### 6.3 Verification of Accuracy of CTMS data

The accuracy of data is verified by reconciling selected data submitted "downwards" to source documents. This part of verification involves the process of agreeing the volume, value and other key information fields within the cost data down to source documents. This verifies the accuracy of the data.

The verification team verified the accuracy of the CTMS information provided in the REQ by reconciling it to source documents in accordance with regard to ADN No 2016/30.

The verification team identified the issues outlined below during this process. Details of this verification process are contained in the verification work program and its relevant attachments, at **Confidential Attachment 1**.

### 6.4 Exceptions during verification of accuracy of CTMS data

**PUBLIC RECORD**

No.	Exception	Resolution
1	Saha Thai included a significant portion of domestic sales of CHS with diameter < 21mm and > 165.1mm in its domestic sales listing. The verification team concludes that these non-like goods were also included in Saha Thai's CTM data.	The verification team assessed whether the additional costs for the relevant MCCs affected the Commission's OCOT test. The verification team found that even with the additional costs, all sales were found to be in OCOT and therefore the verification team proceeded with the CTM data provided by Saha Thai.

**Table 8: Exceptions during verification of accuracy of CTMS data**

### **6.5 Accuracy finding**

The verification team is satisfied that the CTMS data provided in the exporter questionnaire response by Saha Thai, including any required amendments as outlined as an exception above, is accurate and reasonably reflect the costs associated with the production and sale of the goods under consideration.

## 7 EXPORT PRICE

### 7.1 The importer

The verification team considers Saha Thai's Australian customer, Macsteel International Australia Pty. Ltd. (Macsteel) to be the beneficial owner of the goods at the time of importation and therefore Macsteel as importer is:

- named on the commercial invoice as the customer;
- named as the consignee on the bill of lading,
- declared as the importer on the importation declaration to ABF;
- pays for all the importation charges; and
- arranges delivery from the port.

In relation to the goods exported by Saha Thai to Australia, the verification team considers that the customers listed for each shipment were the beneficial owners of the goods at the time of importation, and therefore were the importers of the goods.

### 7.2 The exporter

The verification team considers Saha Thai to be the exporter of the goods<sup>2</sup>, as Saha Thai is:

- the manufacturer of the goods;
- named on the commercial invoice as the supplier;
- named as consignor on the bill of lading;
- arranges and pays for the inland transport to the port of export;
- arranges and pays for the port handling charges at the port of export; and
- arranges and pays for the ocean freight and marine insurance.

The verification team were satisfied that for all Australian export sales during the period the verification team considers Saha Thai to be the exporter of the goods.

### 7.3 Arm's length

Saha Thai did not have any related Australian customers during the inquiry period.

The verification team therefore considers that all export sales made by Saha Thai to its unrelated Australian customers during the period were arm's length transactions.

### 7.4 Export Price – assessment

In respect of Australian sales of the goods by Saha Thai, the verification team recommends that the export price be determined under paragraph 269TAB(1)(a), as the price paid by the importer to the exporter less transport and other costs arising after exportation.

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

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<sup>2</sup> The Commission generally identifies the exporter as a principal in the transaction, located in the country of export from where the goods were shipped, that gave up responsibility by knowingly placing the goods in the hands of a carrier, courier, forwarding company, or its own vehicle for delivery to Australia; or a principal in the transaction, located in the country of export, that owns, or previously owned, the goods but need not be the owner at the time the goods were shipped.

## 8 DOMESTIC SALES SUITABILITY

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

### 8.1 Arm's length

#### 8.1.1 Related party customers

In respect of Saha Thai's domestic sales of like goods to its related customer during the period, the verification team found no evidence that:

- there was any consideration payable for, or in respect of, the goods other than its price; or
- the price was influenced by a commercial or other relationship between the buyer, or an associate of the buyer, and the seller, or an associate of the seller; or
- the buyer, or an associate of the buyer, was directly or indirectly reimbursed, compensated or otherwise receive a benefit for, or in respect of, the whole or any part of the price.<sup>3</sup>

The verification team undertook price analysis between the identified related party customers and unrelated customers in the Thai market and found there was no consistent price difference.

The verification team therefore considers that all domestic sales made by Saha Thai to its related customer during the period were arm's length transactions.

#### 8.1.2 Unrelated customers

In respect of Saha Thai's domestic sales of like goods to its unrelated customers during the period, the verification team found no evidence that:

- there was any consideration payable for, or in respect of, the goods other than its price; or
- the price was influenced by a commercial or other relationship between the buyer, or an associate of the buyer, and the seller, or an associate of the seller; or
- the buyer, or an associate of the buyer, was not directly or indirectly reimbursed, compensated or otherwise received a benefit for, or in respect of, the whole or any part of the price.

The verification team therefore considers that all domestic sales made by Saha Thai to its unrelated domestic customers during the period were arm's length transactions.

### 8.2 Ordinary course of trade

Section 269TAAD states that domestic transactions are not in the ordinary course of trade (OCOT) if arms length transactions are:

- unprofitable in substantial quantities over the investigation period; and
- unlikely to be recoverable within the period.

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<sup>3</sup> Section 269TAA of the Act refers.

The verification team tested profitability by comparing the price at ex-works against the relevant cost for each domestic sales transaction.

The team then tested whether the unprofitable sales were in substantial quantities (not less than 20%) by comparing the volume of unprofitable sales to the total sales volume, for each MCC over the period.

The team tested recoverability by comparing the price at ex-works against the relevant weighted average cost over the period for each domestic sales transaction.

The following table sets out further detail:

<b>OCOT particulars</b>	<b>Details</b>
Price	Net invoice price, excluding direct selling expenses
Cost	Quarterly cost to make and sell, excluding direct selling expenses
Weighted average cost	Weighted average cost to make and sell, excluding direct selling expenses, over the review/inquiry period.

**Table 9: OCOT details**

### 8.3 Suitability of domestic sales

Subparagraph 269TAC(2)(a)(i) provides that the normal value of goods exported to Australia cannot be ascertained under section 269TAC(1) where there is an absence, or low volume, of sales of like goods in the market of the country of export. Domestic sales of like goods are taken to be in a low volume under section 269TAC(14) where the total volume of like goods is less than five percent of the total volume of the goods under consideration that are exported to Australia (unless the Minister is satisfied that the volume is still large enough to permit a proper comparison).

The verification team assessed the total volume of like goods as a percentage of the goods exported to Australia for the whole period and found that the domestic sales were sufficient. As a result, the normal value can be ascertained under section 269TAC(1).

As per the *Dumping and Subsidy Manual*, where the total volume of like goods is greater than five percent of the total volume of the goods under consideration, and where comparable models exist, the Commission also tests the suitability of domestic sales of like goods individually for each model type.

The verification team’s assessment of the suitability of domestic models to the models exported to Australia is further detailed below:

<b>Export MCCs</b>	<b>Sufficient domestic sales of identical MCC</b>	<b>Treatment of normal value where there were insufficient domestic sales of identical MCC</b>
P-N-N-R-350-P	Y	N/A
P-N-O-R-350-P	Y	N/A
P-N-P-R-350-P	Y	N/A
<b>ALL SALES</b>	<b>Y</b>	

**Table 10: Sufficiency test**

## **PUBLIC RECORD**

As outlined in Table 10 above, the verification team found that there were sufficient domestic sales volumes of identical domestic MCCs made in OCOT for the three MCCs exported to Australia.

The verification team's preliminary assessment of domestic sales is at **Confidential Appendix 3**.



## **9 ADJUSTMENTS**

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

### **9.1 Rationale and Method**

<b>Adjustment type</b>	<b>Assessment for adjustment</b>	<b>Calculation method and evidence</b>	<b>Claimed in REQ?</b>	<b>Adjustment required?</b>
Domestic credit terms	There is a difference in payment terms between domestic and export sales.	The verification team utilised the interest rate claimed by Saha Thai for domestic credit.	N	Y
Domestic inland transport	A difference was observed between transport for domestic and export sales.	The verification team used the weighted average review/inquiry period cost from Saha Thai's trial balance.	Y	Y
Domestic packaging	Packaging costs for domestic goods were different from export.	The verification team used the weighted average review/inquiry period cost from Saha Thai's production system.	N	Y
Export packaging	Packaging costs for export goods were different from domestic.	The verification team used the weighted average review/inquiry period cost from Saha Thai's production system.	N	Y
Export inland transport	A difference was observed between transport for domestic and export sales.	The verification team used the actual amount per transaction.	Y	Y
Export port & handling charges	Port and handling charges are relevant only for export sales.	The verification team used the actual amount per transaction.	Y	Y
Export credit terms	There is a difference in payment terms between domestic and export sales.	The verification team utilised the interest rate claimed by Saha Thai for domestic credit.	N	Y
Non-refundable VAT	Not applicable	N/A	N	N/A
Commissions	Not applicable	N/A	N	N/A

**Table 11: Assessment of adjustments**

### **9.2 Adjustments**

The verification team considers the following adjustments under section 269TAC(8) are necessary to ensure that the normal value so ascertained is properly compared with the export price of those goods.

**PUBLIC RECORD**

<b>Adjustment Type</b>	<b>Deduction/addition</b>
Domestic credit terms	Deduct an amount for domestic credit
Domestic inland transport	Deduct an amount for domestic inland transport
Export packaging	Add an amount for export packaging
Export inland transport	Add an amount for export inland transport
Export port charges	Add an amount for port charges
Export credit terms	Add an amount for export credit terms

**Table 12: Summary of adjustments**

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

## 10 NORMAL VALUE

The verification team found that there were models with sufficient volumes of domestic sales of the goods, exported to Australia, that were arms length transactions and at prices that were within the OCOT. The verification team is therefore satisfied that the prices paid in respect of domestic sales of these models of the goods are suitable for assessing normal value under section 269TAC(1).

In using domestic sales as a basis for normal value, the verification team considers that certain adjustments, in accordance with section 269TAC(8), are necessary to ensure fair comparison of normal values with export prices, as outlined in chapter 9 above.

The verification team's preliminary normal value calculations are at **Confidential Appendix 4**.

## 11 DUMPING MARGIN

The dumping margin was assessed by comparing weighted average Australian export prices to the corresponding quarterly weighted average normal value for the investigation period under section 269TACB(2)(a).

The dumping margin for the goods exported to Australia by Saha Thai for the period is **negative 13.1 per cent**.

The preliminary dumping margin calculation is at **Confidential Appendix 5**.

## **12 APPENDICES AND ATTACHMENTS**

<b>Confidential Appendix 1</b>	Export price
<b>Confidential Appendix 2</b>	Cost to make and sell
<b>Confidential Appendix 3</b>	Domestic sales, OCOT and profitability
<b>Confidential Appendix 4</b>	Normal Value
<b>Confidential Appendix 5</b>	Dumping Margin
<b>Confidential Attachment 1</b>	Verification work program