



Exporter Verification Report

Verification & Case Details

Initiation Date	13/02/2020	ADN:	2020/017
Case Number	543		
The goods under consideration	Aluminium Extrusions		
Case type	Continuation Inquiry		
Exporter	Guangdong Jinxiecheng Al Manufacturing Co Ltd		
Location			
Verification from	16/04/2020	to	3/06/2020
Inquiry Period	1/01/2019	to	31/12/2019

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

CONTENTS

CONTENTS.....	2
1 COMPANY BACKGROUND.....	4
1.1 CORPORATE STRUCTURE AND OWNERSHIP	4
1.2 RELATED PARTIES	4
1.3 ACCOUNTING RECORDS.....	4
2 THE GOODS AND LIKE GOODS	5
2.1 PRODUCTION PROCESS	5
2.2 MODEL CONTROL CODES (MCCs)	5
2.3 VERIFICATION OF MCCS	6
2.4 THE GOODS EXPORTED TO AUSTRALIA	7
2.5 LIKE GOODS SOLD ON THE DOMESTIC MARKET.....	7
2.6 LIKE GOODS – ASSESSMENT.....	8
3 VERIFICATION OF SALES COMPLETENESS AND RELEVANCE	9
3.1 EXCEPTIONS DURING VERIFICATION OF SALES COMPLETENESS AND RELEVANCE	9
3.2 SALES COMPLETENESS AND RELEVANCE FINDING.....	10
4 VERIFICATION OF SALES ACCURACY.....	11
4.1 EXCEPTIONS DURING VERIFICATION OF SALES ACCURACY	11
4.2 SALES ACCURACY FINDING	11
5 VERIFICATION OF COST TO MAKE AND SELL (CTMS) COMPLETENESS AND RELEVANCE	12
5.1 COMPLETENESS AND RELEVANCE FINDING OF CTMS DATA.....	12
6 VERIFICATION OF COST TO MAKE AND SELL (CTMS) ACCURACY.....	13
6.1 COST ALLOCATION METHOD	13
6.2 EXCEPTIONS DURING VERIFICATION OF CTMS ALLOCATION METHOD	13
6.3 VERIFICATION OF ACCURACY OF CTMS DATA.....	14
6.4 ACCURACY FINDING.....	14
7 EXPORT PRICE.....	15
7.1 THE IMPORTERS.....	15
7.2 THE EXPORTER	15
7.3 ARMS LENGTH.....	15
7.4 EXPORT PRICE – ASSESSMENT	16
8 DOMESTIC SALES	17
8.1 ARMS LENGTH.....	17
8.2 ORDINARY COURSE OF TRADE	17
8.3 VOLUME OF RELEVANT SALES	17
9 ADJUSTMENTS.....	19
9.1 RATIONALE AND METHOD	19
9.2 ADJUSTMENTS	19
10 NORMAL VALUE	20
11 DUMPING MARGIN	21
12 SUBSIDIES.....	22
12.1 LESS THAN ADEQUATE REMUNERATION	22
12.2 TAX BENEFITS.....	22
12.3 FINANCIAL GRANTS	22

PUBLIC RECORD

12.4 SUBSIDY MARGIN.....22

13 APPENDICES AND ATTACHMENTS.....23

1 COMPANY BACKGROUND

1.1 Corporate Structure and Ownership

Guangdong Jinxiecheng AL. Manufacturing Co., Ltd (Jinxiecheng) was registered in 1998, and its core business activities during the review period was the manufacture and sale of aluminium extrusions. Jinxiecheng is wholly owned by Jinxiecheng AL Co., Ltd, which is ultimately owned by three natural persons.

Jinxiecheng has one site that includes its office and manufacturing facility in Nanhai district, Foshan, Guangdong, China.

Other than its parent company, Jinxiecheng is unrelated to any other entities.

1.2 Related Parties

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

The verification team found that Jinxiecheng did not have any related party customers or suppliers of the goods during the inquiry period.

1.3 Accounting records

Jinxiecheng's financial statements were audited by Guangdong Xinkaicheng Partnership Accounting Firm and includes a statement that the financial accounts comply with Accounting Standards for Business established on February 2, 2006.

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

2 THE GOODS AND LIKE GOODS

2.1 Production Process

Due to Australian government travel restrictions imposed in response to the COVID-19 pandemic, the verification team was unable to visit Jinxiecheng's manufacturing facility to observe the goods being produced. Jinxiecheng's manufacturing facilities were previously visited by Commission representatives in November 2018. Jinxiecheng advised that there has been no change to the manufacturing process since that visit.

The manufacturing process is as follows:

- Jinxiecheng primarily purchased aluminium ingot, and a small amount of aluminium billet, which is considered a semi-finished product;
- Aluminium ingot and other materials are transferred from raw material inventories to the casting workshop to form aluminium billet;
- Aluminium billet is transferred from the billet inventory to the extrusion workshop, where the billet is squeezed through an extruding die to produce a mill finished profile;
- All mill finished extruded profiles are cut to size depending on customer requirements;
- Mill finished profiles were sold as finished product, as well as transferred into other workshops for further processing;
- For powder coated profiles, mill finished profiles are transferred to the powder coating workshop, which undertakes electrostatic spraying then heat treatment in a curing oven;
- For anodised profiles, mill finished profiles are transferred to the anodising workshop where it is sand blasted, surface treated, then sprayed with oxidation powder;
- For electrophoresis profiles, anodised profiles are transferred within the anodising workshop to the electrophoretic tank where they are coated, then transferred for heat treatment in a curing oven;
- Finished goods are transferred for packaging, then are picked-up by the customer at Jinxiecheng's factory.

Jinxiecheng provided a flow chart of the production process in its exporter questionnaire response (REQ). There is no difference in the manufacturing process for aluminium extrusions produced for the domestic or export market.

2.2 Model Control Codes (MCCs)

Jinxiecheng provided sales and cost data in its response to the exporter questionnaire in accordance with the model control code (MCC) structure detailed in Anti-Dumping Notice (ADN) No. 2020/017.

Jinxiecheng proposed an amendment to the MCC structure to reflect the production and sale of an additional finish type, electrophoresis.

PUBLIC RECORD

Jinxiecheng provided sales data according to finish (mill finish, powder coated, anodised and electrophoresis), alloy and temper level. However, as Jinxiecheng’s accounting system only captures weighted average costs at a finish level it was only able to provide cost data according to finish type and was unable to breakdown costs to the alloy and temper levels.

2.2.1 Amendments to MCCs

Based on analysis of the price comparability of the goods under consideration, the verification team considers it necessary to make amendments to the MCC structure.

No.	Exception	Resolution
1	Jinxiecheng produces an additional model – electrophoresis - for sale on the domestic market. This is an anodised extrusion that is further worked through electrophoresis painting in a conductive tank.	The verification team included electrophoresis as a finish type in the domestic MCC structure.

Table 1 - Amendments to the MCCs

2.3 Verification of MCCs

Table 2 below provides detail on how the MCC sub-categories were determined and verified to source documents.

Category	Determination of the sub-category
Finish	Determined with reference to the description in commercial documents.
Alloy code	Determined with reference to the description in commercial documents.
Temper Code	Determined with reference to the description in commercial documents.

Table 2 - MCC sub-category determination

Error! Reference source not found. below displays the relationship between product characteristics and MCC categories.

Category	Sub-category	
Finish	A	Anodise
	E	Electrophoresis
	M	Mill
	PC	Powder coating
Alloy code	6A	6060, 6063
	6B	6106
	6C	6101, 1350, 6082, 6351, 6061

PUBLIC RECORD

	6D	6005A
	O	Other*
Temper code	T1	T1, T4, T5, T6
	T50	T591, T595, T52
	O	Other*

Table 3- MCC characteristics

As detailed, Jinxiecheng was only able to provide cost data by finish, and as such the verification team considers the following categories are appropriate when comparing sales of domestic models with export models:

- Anodised
- Electrophoresis
- Mill finish
- Powder coated

2.4 The goods exported to Australia

The verification team was satisfied that Jinxiecheng produced and exported the goods to Australia. Jinxiecheng exported the goods to Australia with the following MCCs during the period:

- A-6A-T1
- M-6A-T1
- M-6D-T1
- PC-6A-T1

2.5 Like goods sold on the domestic market

The verification team was satisfied that Jinxiecheng 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, as they:

- are not distinguished from exported goods during production (the exported goods and goods sold on the domestic market are produced in the same way, subject to individual customer specifications, and the costs of production for models sold domestically and for export are the same);
- are produced at the same facilities, using the same raw material inputs and manufacturing processes;
- The goods compete in the same market sector, are interchangeable and use similar distribution channels; and
- Can be considered functionally alike, as they have similar end uses.

Jinxiecheng sold like goods on the domestic market with the following MCC's during the review period:

- A-6A-T1
- E-6A-T1
- M-6A-T1
- PC-6A-T1

2.6 Like goods – assessment

The verification team considers that the goods produced by Jinxiecheng 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).¹

¹ References to any 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 in accordance with ADN No. 2016/30.

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

- Jinxiecheng's total company revenue in its 2019 audited financial accounts reconciled to the general ledger;
- The general ledger was filtered by revenue codes such that the total company revenue by finish type reconciled to the total revenue for each finish type in the upward sales reconciliation contained within the REQ;
- The total of domestic sales, Australian sales and third country sales reconciled to the total sales revenue.

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**.

3.1 Exceptions during verification of sales completeness and relevance

No.	Exception	Resolution
1	The verification team found that two transactions had been recorded as domestic sales when they were in fact sales to Australia.	The relevant sales were removed from the domestic sales listing and added to the Australian sales listing.
2	Even though the value of sales in the sales listing reconciled to the financial statement, the verification team established that a series of sales had been invoiced in 2019 despite the purchaser having taken possession in 2018.	The verification removed all sales that were determined by checking warehouse slips to have transferred possession in 2018 despite having been invoiced in 2019.

Table 4 - 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 in the REQ by Jinxiecheng, including the required amendments as outlined as an exception above, 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 in accordance with 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.	In the Australian sales listing, sales to one trading company had been recorded as Ex-works when the sales were in fact FOB.	The Australian sales listing was amended to change the shipment terms. In addition, the Australian sales listing was amended to include all direct selling costs incurred by Jinxiecheng in transporting the goods from the factory to the FOB point. This was done by determining the total direct selling expenses recorded in the "transportation and customs fees" sub ledger and allocating those expenses by weight to the Australian and third country sales made by the trading company.
2.	The domestic sales listing contained a number of instances where the MCC recorded did not align with the category "finish".	The verification team established from source document for the relevant sales what the correct MCC was and amended the domestic sales list accordingly.

Table 5 - Exceptions during verification of accuracy of sales data

4.2 Sales accuracy finding

The verification team is satisfied that the sales data provided by Jinxiecheng, 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**.

5 VERIFICATION OF COST TO MAKE AND SELL (CTMS) 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 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 in accordance with ADN No. 2016/30.

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

- Jinxiecheng's total company cost of goods sold (COGS) in its audited 2019 financial accounts reconciled to its 2019 trial balance COGS;
- The trial balance ledgers reconciled to the finished goods inventory ledger;
- The finished goods inventory ledger for the goods was reconciled to the costs data submitted in the REQ

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

- Jinxiecheng's SG&A expenses in the audited 2019 financial statements reconciled to the 2019 trial balance.

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**.

5.1 Completeness and relevance finding of CTMS data

The verification team is satisfied that the CTMS data provided in the exporter questionnaire response by Jinxiecheng 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, in accordance with 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**.

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

Cost item	Method applied
Raw Materials	Weighted average actual cost to move goods from raw materials to finished goods.
Scrap Allocation	Valued at 90% of the ingot and billet monthly purchase price.
Manufacturing Overheads	Allocation based on production quantities and an estimation rate.
Labour	Allocation based on production quantities and an estimation rate.
Packaging	Actual costs allocated to the cost to make of the good.
Depreciation	Allocation based on production quantities and an estimation rate.

Table 6 - Cost allocation method

6.2 Exceptions during verification of CTMS allocation method

No.	Exception	Resolution
1	The verification identified that the entirety of selling expenses incurred by Jinxicheng had been allocated to sales, rather than direct selling expenses having been attributed to the relevant sales and the remaining (indirect) selling expenses then allocated.	SG&A allocation was amended to remove the direct selling expenses.

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 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**.

6.4 Accuracy finding

The verification team is satisfied that the CTMS data provided in the exporter questionnaire response by Jinxiecheng, 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.

Jinxiecheng's CTMS data is at **Confidential Appendix 2**.

7 EXPORT PRICE

7.1 The importers

In relation to Jinxiecheng's sales of goods that are exported to Australia, the verification team considers that the Australian customers of the traders to which Jinxiecheng sold 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 Jinxiecheng to be the exporter of the goods², as Jinxiecheng:

- is the manufacturer of the goods;
- sold to traders that subsequently managed the export of the goods to Australia;
- was aware that the goods would be exported to Australia prior to giving up responsibility of the goods to the traders; and
- the traders acted as intermediaries, rather than distributors, as they did not have their own inventories for export sales.

The verification team is satisfied that for all Australian export sales during the period that Jinxiecheng was the exporter of the goods.

7.3 Arms length

7.3.1 Unrelated trading company sales

For all Australian sales of the goods, Jinxiecheng sold to traders on the domestic market.

In respect of Jinxiecheng's sales of the goods to its unrelated trading company purchasers that were subsequently sold to Australian 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 appeared to be 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

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

- the 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.³

The verification team therefore considers that all export sales made by Jinxiecheng to its unrelated trading company purchasers that were subsequently sold to Australian customers during the period were arms length transactions.

7.4 Export Price – assessment

In respect of Australian sales of the goods by Jinxiecheng, the verification team found that the importer has not purchased the goods from the exporter, therefore, export prices cannot be determined under sections 269TAB(1)(a) or 269TAB(1)(b). The verification team recommends that the export price be calculated under section 269TAB(1)(c) having regard to all the circumstances of the exportation. Specifically, the verification team recommends that the export price be calculated as the price paid or payable for the goods by the traders to Jinxiecheng in arms length transactions less the prescribed deductions.

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

³ Section 269TAA refers.

8 DOMESTIC SALES

Section 269TAC(1) provides the general rule for calculating normal value. For sales to be relevant for the purpose of section 269TAC(1), they must be sales of like goods sold in the exporter's domestic market for home consumption that are at arms length and in the ordinary course of trade (OCOT).

8.1 Arms length

8.1.1 Unrelated customers

In respect of Jinxiecheng'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 appeared to be 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 Jinxiecheng to its unrelated domestic customers during the period were arms length transactions.

8.2 Ordinary course of trade

Section 269TAAD states that domestic sales of like goods are not in the OCOT if arms length transactions are:

- unprofitable in substantial quantities over an extended period; and
- unlikely to be recoverable within a reasonable period.⁴

The verification team have collected the necessary data to conduct an OCOT assessment, based on the reported costs and sales at the time of verification. The application has claimed that exporters' records do not reasonably reflect competitive market costs associated with the production or manufacture of like goods. The Commission is currently considering this claim. Therefore, the assessment of whether domestic sales are in the OCOT has been referred to the case management team for consideration.

8.3 Volume of relevant sales

The verification team have collected the necessary data to conduct a volume analysis, based on the reported costs and sales at the time of verification. The

⁴ In general, the Commission will consider 'extended period' and 'reasonable period' to be the investigation, review or inquiry period.

PUBLIC RECORD

application has claimed that the market in the country of export is such that sales in that market are not suitable for use in determining a normal value under section 269TAC(1) (section 269TAC(2)(a)(ii)). The application has also claimed that exporters' records do not reasonably reflect competitive market costs associated with the production or manufacture of like goods.

The Commission is currently considering these claims. Therefore, the verification team has referred consideration of the volume of relevant sales to the case management team.

9 ADJUSTMENTS

To ensure the normal value is comparable to the export price of goods exported to Australia at free-on-board (FOB) terms, the verification team has considered the following adjustments in accordance with section 269TAC(8) or section 269TAC(9)⁵.

9.1 Rationale and Method

Adjustment type	Assessment for adjustment	Calculation method and evidence	Claimed in REQ?	Adjustment required?
Domestic credit terms	Jinxiecheng offers credit terms for domestic customers.	The domestic credit rate is based on Jinxiecheng's short term borrowing rate applied to the weighted average number of payment days.	Y	Y
Export inland transport, handling and port charges	Jinxiecheng incurred these charges in relation to certain sales to Australia.	Weighted average unit value based on the total inland transport, handling and port charges incurred and the invoice quantity.	N	Y

Table 8 - Assessment of adjustments

9.2 Adjustments

The verification team considers the following adjustments under section 269TAC(8) or section 269TAC(9) are necessary to ensure that the normal value so ascertained is properly compared with the export price of those goods.

Adjustment Type	Deduction/addition
Domestic credit terms	Deduct an amount for domestic credit
Export inland transport, handling and port charges	Add an amount for export inland transport, handling and port charges

Table 9 - Summary of adjustments

⁵ As the case team is assessing market situation claims, a basis for normal value has not been determined. The basis on which the normal value is determined will determine the section under which adjustments are necessary.

10 NORMAL VALUE

As stated in chapter 8, the application has claimed that the situation in the market in the country of export is such that sales in that market are not suitable for use in determining a normal value under section 269TAC(1) (section 269TAC(2)(a)(ii)). Where section 269TAC(2)(a)(ii) is satisfied, normal value may be constructed under section 269TAC(2)(c).

The verification team has not considered whether section 269TAC(2)(a)(ii) is satisfied. Therefore, the verification team has not calculated a normal value and has referred the calculation of the normal value to the case team.

The verification team recommends that, once the case team determines the basis for calculating the normal value, certain adjustments in accordance with either section 269TAC(8) or section 269TAC(9) are necessary to ensure that normal values are properly comparable with export prices. These adjustments are outlined in chapter 0 above.

11 DUMPING MARGIN

Normal values were not determined as part of the verification process (see chapter 10 of this report). As such, the verification team was not able to calculate a dumping margin for the goods exported to Australia by Jinxiecheng for the period. The calculation of the dumping margin has been referred to the case management team and will be detailed in the Statement of Essential Facts.

12 SUBSIDIES

12.1 Less than adequate remuneration

The verification team verified the completeness, relevance and accuracy of the raw material purchase listing provided in the REQ by reconciling the listing up to the general ledger and down to source documents.

The verification team also collected information on whether the raw material was supplied by and/or manufactured by a State Invested Enterprise.

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**.

12.2 Tax benefits

The verification team verified the income tax information provided in the REQ by reconciling the information to the tax returns and proof of payment documents.

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**.

12.3 Financial Grants

The verification team verified the completeness, relevance and accuracy of the financial grants listing provided in the REQ by reconciling the listing up to the general ledger and down to source documents.

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**.

12.4 Subsidy margin

The verification team found that Jinxiecheng received a benefit in relation to the following programs:

- Subsidy for the employment of the disabled

On the basis that the case management team finds these programs to be countervailable subsidies, the verification team has calculated a preliminary subsidy margin for Jinxiecheng during the investigation period to be **0.0 per cent**.

Details of the preliminary subsidy margin calculation are at **Confidential Appendix 6**.

13 APPENDICES AND ATTACHMENTS

Confidential Appendix 1	Export price
Confidential Appendix 2	Cost to make and sell
Confidential Appendix 6	Subsidy Margin
Confidential Attachment 1	Verification work program