



## Exporter Questionnaire: the Republic of Indonesia

**Case number:** 551

**Product:** A4 copy paper

**From:** the Federative Republic of Brazil, the People's Republic of China, the Republic of Indonesia (except PT. Indah Kiat Pulp & Paper Mills, PT. Pabrik Kertas Tjiwi Kimia Tbk and PT. Pindo Deli Pulp & Paper Mills) and the Kingdom of Thailand

**Review period:** 1 January 2019 to 31 December 2019

**Response due by:** **25 June 2020**

**Return completed questionnaire to:**  
[investigations2@adcommission.gov.au](mailto:investigations2@adcommission.gov.au)

**Anti-Dumping Commission website:** [www.adcommission.gov.au](http://www.adcommission.gov.au)

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## INSTRUCTIONS

### Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the Commission) is conducting a review of the anti-dumping measures (in the form of a dumping duty notice and a countervailing duty notice) applying to certain A4 copy paper (the goods) exported to Australia from the Federative Republic of Brazil (Brazil), the People's Republic of China (China), the Republic of Indonesia (Indonesia) (except by PT. Indah Kiat Pulp & Paper Mills, PT. Pabrik Kertas Tjiwi Kimia Tbk and PT. Pindo Deli Pulp & Paper Mills) and the Kingdom of Thailand (Thailand).

The Commission will use the information you provide to determine whether the normal values and export prices have changed.

### 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 Commission of the contact details for these manufacturers **immediately**.

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

### What happens if you do not respond to this questionnaire?

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

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

### Extension requests

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

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 public record version of your questionnaire 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 questionnaires are required to have a bracketed explanation of deleted or blacked out information for the public record version of the questionnaire. 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**

On 20 March 2020, the Commission published Anti-Dumping Notice No. 2020/029,<sup>1</sup> advising that onsite exporter verification activities have been temporarily suspended until further notice as a result of the COVID-19 pandemic.

The Commission remains committed to ensuring that data submitted by parties is complete, relevant and accurate. If an onsite visit is not possible, the Commission may elect to undertake alternative verification activities. This includes but is not limited to remote verification, desktop assessments or delaying verification activities until such time as onsite verification is possible. The Commission will continue to monitor current events and assess when the suspension of onsite exporter verification activities can be lifted.

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<sup>1</sup> [https://www.industry.gov.au/sites/default/files/adc/public-record/notice\\_adn\\_-\\_adn\\_2020-029\\_-\\_temporary\\_suspension\\_of\\_international\\_onsite\\_verification\\_0.pdf](https://www.industry.gov.au/sites/default/files/adc/public-record/notice_adn_-_adn_2020-029_-_temporary_suspension_of_international_onsite_verification_0.pdf)

A verification visit, or any verification activity 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.

Onsite verification is usually conducted over 4 days, remote and desktop verification may take a longer period of time. In complex cases, a verification visit, if conducted, may be scheduled over 5 days. A desktop verification may require a longer period.

Any verification activity 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, should an onsite visit be possible, may also be required during the verification visit.

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

A report will be prepared following the verification activity, which details the outcomes of the verification. This report will be placed on the public record and may include the publication of the preliminarily-assessed dumping 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.

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 Commission to request access to SIGBOX if required.

## CHECKLIST

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

<b>Section</b>	<b>Please tick if you have responded to all questions</b>
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"/>
Section H Market situation	<input type="checkbox"/>
Section I Market situation & proper comparison	<input type="checkbox"/>
Section J Proper comparison – Indonesian A4 copy paper market	<input type="checkbox"/>
Section K Proper comparison – Production costs	<input type="checkbox"/>
Section L Proper comparison – Australian A4 copy paper market	<input type="checkbox"/>
Exporter's declaration	<input type="checkbox"/>
Non-confidential version of this response	<input type="checkbox"/>

<b>Attachments</b>	<b>Please tick if you have provided spreadsheet</b>
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-3.A Domestic CTM - Pulp	<input type="checkbox"/>
G-3.B Domestic CTM – Wood chip	<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-5.A Australian CTM – Pulp	<input type="checkbox"/>
G-5.B Australian CTM – Wood chip	<input type="checkbox"/>

**PUBLIC RECORD**

**Internal**

G-7 Raw material purchase	<input type="checkbox"/>
G-8 Upwards costs	<input type="checkbox"/>
G-9 Capacity utilisation	<input type="checkbox"/>



## GOODS SUBJECT TO ANTI-DUMPING MEASURES

The goods subject to the anti-dumping measures are:

*uncoated white paper of a type used for writing, printing or other graphic purposes, in the nominal basis weight range of 70 to 100 gsm and cut to sheets of metric size A4 (210mm x 297mm) (also commonly referred to as cut sheet paper, copy paper, office paper or laser paper).*

At the time of the original investigation, the applicant provided the following additional information to clarify the scope of the goods description:

*The paper is not coated, watermarked or embossed and is subjectively white. It is made mainly from bleached chemical pulp and/or from pulp obtained by a mechanical or chemi-mechanical process and/or from recycled pulp.*

### Tariff classification

The goods are generally, but not exclusively, classified to the following tariff subheadings in Schedule 3 to the *Customs Tariff Act 1995*.

Tariff Subheading	Statistical Code	Description
4802		UNCOATED PAPER AND PAPERBOARD, OF A KIND USED FOR WRITING, PRINTING OR OTHER GRAPHIC PURPOSES, AND NON PERFORATED PUNCH-CARDS AND PUNCH TAPE PAPER, IN ROLLS OR RECTANGULAR (INCLUDING SQUARE) SHEETS, OF ANY SIZE, OTHER THAN PAPER OF 4801 OR 4803; HAND-MADE PAPER AND PAPERBOARD:
4802.56		Weighing 40 g/m <sup>2</sup> or more but not more than 150 g/m <sup>2</sup> , in sheets with one side not exceeding 435 mm and the other side not exceeding 297 mm, in the unfolded state:
4802.56.10		<i>Printing and writing paper, 297 mm x 210 mm (A4 paper) ): Weighing 40 g/m<sup>2</sup> or more but less than 90 g/m<sup>2</sup>:</i>
	03	<i>White</i>
	09	<i>Weighing 90 g/m<sup>2</sup> or more but not more than 150 g/m<sup>2</sup></i>

These tariff classifications and statistical codes may include goods that are both subject and not subject to the anti-dumping measures. The listing of these tariff classifications and statistical codes is for reference only and do not form part of the goods description.

**Model Control Code**

Details of the model control code (MCC) structure for the goods are provided in the table below. Export sales data (Section B-2), domestic sales data (Section D-2) and cost to make and sell data (Sections G-3, G-4 and G-5) submitted in this response must follow this MCC structure. At a minimum, the data must report sales and cost data separately for each of the mandatory MCC categories identified by the Commission.

Category	Sub-category	Identifier	Sales data	Cost data
Weight (grams per square metre (gsm))	70 gsm	70	Mandatory	Mandatory
	> 71 gsm to 80 gsm	80		
	> 81 gsm to 85 gsm	85		
	> 85 gsm to 90 gsm	90		
	> 91 gsm to 100 gsm	100		
Recycled content	100%	R100	Mandatory	Mandatory
	50% to 99%	R50		
	30% to 49%	R30		
	1% to 29%	R10		
	0%	N		

In constructing a MCC, use a "-" between each category. For example: 70-R100.

The MCCs will be used to model match export models to the identical or comparable domestic models. In addition, the MCCs will be used to determine domestic sales in the ordinary course of trade by comparing domestic selling prices to the corresponding cost to make and sell. The MCCs may also be used to compare the export price to the cost to make the exported model as part of the constructed normal value.

If there are models manufactured and sold by your company that do not align within the MCC structure above, this should be raised by lodging a submission with the Commission as soon as is practicable, but no later than the time this questionnaire is due, otherwise the response may be deemed deficient.

## SECTION A COMPANY INFORMATION

### A-1 Company representative and location

1. Please nominate a contact person within your company:

Name: [REDACTED]  
Position in the company: Senior Manager, Legal  
Telephone: [REDACTED]  
E-mail address: [REDACTED]

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

Name: Andrew Percival  
Company: Percival Legal  
Telephone: +61 (0)425 221 036  
E-mail address: andrew.percival@percivallegal.com.au

*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.*

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

Level 12, Tower 2,  
Averis Tower, Avenue 5, Wisma Averis,  
Bangar South, No. 8 Jalan Kerinchi,  
59200 Kuala Lumpur,  
Malaysia

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

APRIL Far East (Malaysia) Sdn. Bhd. does not produce the goods under consideration. The goods under consideration are produced by PT Riau Andalan Kertas, details of whom are set out below. Its records are held at its office, also detailed below.

### A-2 Company information

1. What is the legal name of your business?

APRIL Far East (Malaysia) Sdn. Bhd. ("AFEM")

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

AFEM trades under its own name.

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

No.

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

The directors of AFEM are:

Directors	Appointment dates
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]


The names and dates of appointment are confidential.

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

Yes. See attached **Confidential Attachment A-2.9 (Internal Organization Chart)**.

6. Is your company or parent company publicly listed?  
If yes, please provide:
- (a) The stock exchange where it is listed; and
  - (b) Any principle shareholders<sup>2</sup>
- If no, please provide:
- (a) A list of all principal shareholders and the shareholding percentages.

Neither AFEM nor its parent company is publicly listed.

AFEM's parent company is [REDACTED].

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.

AFEM is principally involved in the trading of pulp and paper products in Malaysia and other parts of the world, and the provision of management services.

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;

PT Riau Andalan Kertas ("**RAK**")

Registered address - Jl. Teluk Betung No. 31, Kebon Melati, Tanah Abang, Jakarta Pusat 10230, Indonesia.

Operating address - Kecamatan Langgam Kabupaten Pelalawan, Pangkalan Kerinci, Pekanbaru Riau, 28300 Indonesia

- (b) sell in the domestic market;

RAK – as above.

- (c) export to Australia; and

In 2019, AFEM exported the goods under consideration ("**GUC**") to Australia

- (d) export to countries other than Australia.

APRIL International Enterprise Pte. Ltd. ("**AIE**") and AFEM export similar goods to the **GUC** to third countries.

9. Provide your company's internal organisation chart.

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<sup>2</sup> 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.

See [Confidential Attachment A-2.9 \(Internal Organization Chart\)](#).

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

The only APRIL companies involved in the production, sale and marketing of A4 Copy Paper in Indonesia and Australia during the review period are RAK and AFEM. As disclosed above, AIE also is involved in the export of like goods to third countries.

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

See [Non-Confidential Attachments \(Brochures\)](#).

### A-3 General accounting information

1. What is your financial accounting period?

The financial accounting period is the calendar year – [REDACTED].

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

Yes. [REDACTED]

3. What currency are your accounts kept in?

AIE's and RAK's financial accounts are in [REDACTED]. AFEM's financial accounts are in [REDACTED].

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

[REDACTED]

5. What is the name of your sales system?

[REDACTED]

6. What is the name of your production system?

[REDACTED]

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.

N/A

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

The accounting practices of each of RAK, AIE and AFEMY are in accordance with the generally accepted accounting principles in their respective countries

[REDACTED]

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

No.

## 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.

Audited financial statements for RAK, AIE and AFEM are **attached**. See:

**Confidential Attachment A4 -1 – AFEMY Audited Financial Statements for Financial Year 2019;**

**Confidential Attachment A4 -1 – AFEMY Audited Financial Statements for Financial Year 2018;**

**Confidential Attachment A4 -1 – AIE Audited Financial Statements for Financial Year 2019;**

**Confidential Attachment A4 -1 – AIE Audited Financial Statements for Financial Year 2018;**

**Confidential Attachment A4 -1 – RAK Audited Financial Statements for Financial Year 2019; and**

**Confidential Attachment A4 -1 – RAK Audited Financial Statements for Financial Year 2018.**

Each of the audited financial statements is confidential.

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.

N/A

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

N/A

4. If the review 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 review period; or
  - (b) Quarterly or half yearly income statements directly from your accounting system covering the most recent financial period and the review period.

N/A

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

Please see **Confidential Attachment A-4.4 (Trial Balance)**.

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

Please see **Confidential Attachment A-5 (Chart of Accounts)**.

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

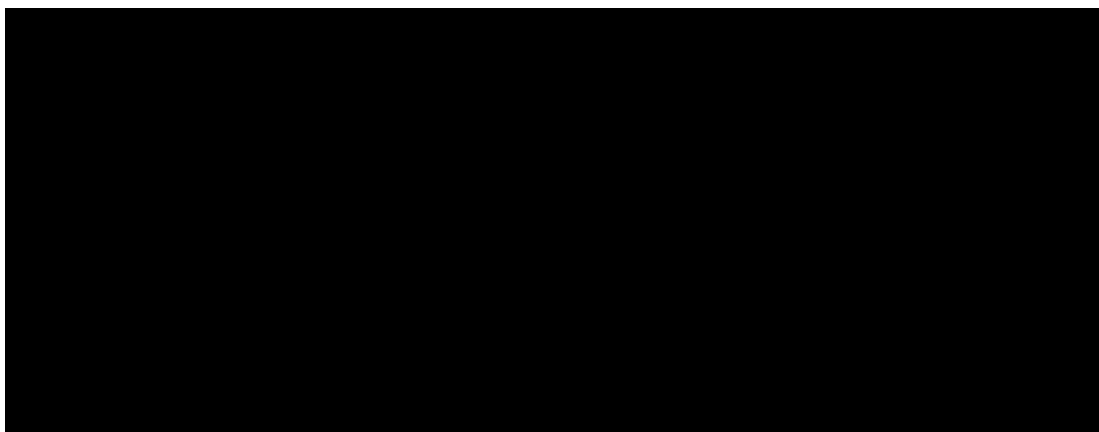
## SECTION B

### EXPORT SALES TO AUSTRALIA

If your company exported low or no volumes of the goods to Australia during the review period, please contact the Commission as soon as possible. You may be required to complete this section (and G-5) as it relates to export sales to a country other than Australia. You may also be asked other supplementary questions. Extensions will not be granted as a result of delays in contacting the Commission in this regard.

#### 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



[Confidential Commercial Information Deleted – Australian sales processes]

Please refer to [Confidential Attachment B-1 \(1\) \(Sales Flowchart\)](#). This attachment is being provided on a **confidential** basis.

2. 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;
  - (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?

[AFEM bills and invoices its Australia customers in](#) [REDACTED]

[Australian customers pay](#) [REDACTED].

3. 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.

[Not applicable. AFEM is not related to any of its Australian customers](#)

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

Yes, please refer to **Confidential Attachments B1-4**. These price lists represent the desired price targets. Country sales managers may negotiate lower prices that must be approved by the pricing committee.

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

AFEM only has one distribution channel for the sale of goods during the review period [REDACTED]

6. 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 review period? If yes, provide a description and explain the terms and conditions that must be met by the customer to obtain the discount.

Eligible Australian customers may receive an on-invoice, early bird discount of [REDACTED], subject to the conditions stated below being met:

i) [REDACTED]; and  
[REDACTED].

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

Not applicable. AFEM did not provide any credit or debit notes in relation to the sale of the GUC during the review period.

8. The invoice date will normally be taken to be the date of sale. If you are making a claim that a different date should be taken as the date of sale:
- What date are you claiming as the date of sale?
  - Why does this date best reflect the material terms of sale?

AFEM considers the invoice date to be the date of sale of the GUC.

## B-2 Australian sales listing

- 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 review 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.

See **Confidential Attachment B-2 (Australian Sales)**

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



### B-3 Sample export documents

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

See [Confidential Attachment B-3 \(Sample Documents – Exports\)](#)

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

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

### B-4 Reconciliation of sales to financial accounts

1. 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.
  - 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.

See [Confidential Attachment B-4 \(Upwards sales\)](#).

2. 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.

See [Confidential Attachment B-4 \(Upwards sales\)](#).

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:
  - the name of the source document, including the relevant page number, in column D of the worksheet; and
  - highlight or annotate the amount shown in the source document.

See [Confidential Attachment B-4 \(Upwards sales\)](#).

### B-5 Reconciliation of direct selling expenses to financial accounts

1. Please complete the worksheet named “B-5 Upwards selling expense” to demonstrate that the direct selling expenses (e.g. Inland transport) in B-2 and D-2 are complete.
  - You must provide this list in electronic format using the template provided.
  - Please use the currency that your accounts are kept in.
  - If you have used formulas to complete this worksheet, these formulas must be retained.

See [Confidential Attachment B-5 \(Upwards selling expenses\)](#).

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.

See [Confidential Attachment B-5 \(Upwards selling expenses\)](#).

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:
  - the name of the source document, including the relevant page number, in column C of the worksheet; and
  - highlight or annotate the amount shown in the source document.

See **Confidential Attachment B-5 (Upwards selling expenses)**.

## SECTION C EXPORTED GOODS & LIKE GOODS

The Commission considers the MCC structure in and of itself is not likely to be commercially sensitive information. Any claim that disclosing the MCC information is confidential or would adversely affect your business or commercial interests must be raised by lodging a submission as soon as practicable, but no later than the time this questionnaire is due.

### C-1 Models exported to Australia

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

See [Confidential Attachment C-1, 2 & 3 \(Product Codes\)](#).

2. Provide a list of MCCs of the goods exported to Australia. This must cover all MCCs listed in the Australian sales listing in B-2.
  - This list must be disclosed in the public record version of the response.

See [Confidential Attachment C-1, 2 & 3 \(Product Codes\)](#). *The matching of product codes with MCCs for export sales is as follows:*

Product Code	MCC
[REDACTED]	[REDACTED]

[Confidential information deleted as being confidential commercial information of APRIL, disclosure of which would be adverse to APRIL.]

### C-2 Models sold in the domestic market

1. Fully describe all like goods your company sold on the domestic market during the review 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.

See [Confidential Attachment C-1, 2 & 3 \(Product Codes\)](#).

2. Provide a list of MCCs of like goods sold on the domestic market. This must cover all MCCs listed in the domestic sales listing in D-2.
  - This list must be disclosed in the public record version of the response.

See [Confidential Attachment C-1, 2 & 3 \(Product Codes\)](#). *The matching of product codes with MCCs for domestic sales is as follows:*

Product Code	MCC
[REDACTED]	70-N
[REDACTED]	75-N
[REDACTED]	80-N
[REDACTED]	100-N

[Confidential information deleted as being confidential commercial information of APRIL, disclosure of which would be adverse to APRIL.]

### C-3 Internal product codes

1. Does your company use product codes or stock keeping unit (SKU) codes?  
If yes:

- (a) Provide details of the product or SKU coding system for the goods, such as a legend or key of the meaning for each code within the product or SKU code.
- (b) Provide details on how you mapped the product or SKU codes to the MCC for the purpose of completing this questionnaire.
- (c) Provide a table of showing the product or SKU codes for each MCC.

If no:

- (a) Provide details on the method used to identify the MCC in the sales and cost spreadsheets.

RAK uses internal product codes. These are set out in **Confidential** Attachment C-1, 2 & 3 (Product Codes).

The internal product codes were mapped in accordance with the instructions set out on page 10 of this Questionnaire.

Essentially, internal product codes that related to the physical characteristics of the goods were identified and then these product codes were used to create “product code control numbers” in order to identify the goods according to their different physical characteristics.

## 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

Please see [Confidential Attachment D-2 \(Domestic Sales\)](#).

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

No.

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

N/A

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.

The price negotiated between the domestic customer and RAK sales department is according to market conditions. RAK's pricing committee also regularly evaluates the market conditions and prepares internal price guidance documents for order intake control purposes.

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 review period? If yes, provide a description; and explain the terms and conditions that must be met by the importer to obtain the discount.

[REDACTED]

[REDACTED]

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 review period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.

No.

7. The invoice date will normally be taken to be the date of sale. If you are making a claim that a different date should be taken as the date of sale:
  - (a) What date are you claiming as the date of sale?
  - (b) Why does this date best reflects the material terms of sale?

N/A.

## 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 review 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.

See [Confidential Attachment D-2 \(Domestic Sales\)](#).

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

See [Confidential Attachment D-2 \(Domestic Sales\)](#).

## D-3 Sample domestic sales documents

1. Select the two largest invoices by value and provide the following documentation:
  - Contracts
  - Purchase order and order confirmation
  - Commercial invoice and packing list
  - Proof of payment and accounts receivable ledger
  - Documents showing bank charges
  - Delivery invoices

Sample domestic sales documents are attached: see [Confidential Attachment D-3 \(Sample Documents Domestic Sales\)](#). All of these sample domestic sales documents are confidential.

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

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

See [Confidential Attachment D-2 \(Domestic Sales\)](#).

## D-4 Reconciliation of sales to financial accounts

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

1. Please complete the worksheet named "B-4 Upwards sales" to demonstrate that the sales 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.

No response required.

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:
  - the name of the source document, including the relevant page number, in column D of the worksheet; and
  - highlight or annotate the amount shown in the source document.

N/A

## SECTION E DUE ALLOWANCE

### E-1 Credit expense

1. Do you provide credit to any domestic customers in relation to sales of like goods (i.e. payment terms that are not on a cash or pre-payment basis)? If yes:
  - (a) Do you provide a rolling credit facility to your domestic customers (i.e. no specific payment terms agreed at the time of sale)? If yes:
    - i. Calculate the accounts receivable turnover for each domestic customer (credit sales divided by the average accounts receivable).
    - ii. Calculate the average credit term for each domestic customer by dividing 365 by the accounts receivable turnover
  - (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?

[REDACTED]

2. Do you provide credit to any Australian customers in relation to sales of the goods (i.e. payment terms that are not on a cash or pre-payment basis)? If yes:
  - (a) Do you provide a rolling credit facility to your Australian customers (i.e. no specific payment terms agreed at the time of sale)? If yes:
    - i. Calculate the accounts receivable turnover for each domestic customer (credit sales divided by the average accounts receivable).
    - ii. Calculate the average credit term for each domestic customer by dividing 365 by the accounts receivable turnover
  - (b) If your Australian customers pay you into a foreign currency denominated account (question B-1.2(a) refers):
    - i. Do you have short term borrowings or an overdraft facility denominated in the same foreign currency? If yes, what is the interest rate, or average of interest rates?
    - ii. What is the interest rate, or average of interest rates, applying to term deposits or other cash product (e.g. bonds) denominated in the same foreign currency? If yes, what is the interest rate, or average of interest rates?

[REDACTED]

### E-2 Packaging

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

Both domestic and export sales are packed in the same manner. [REDACTED]

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

See above.

3. If there are distinct differences in packaging between your domestic and export sales:
  - (a) Provide details of the differences
  - (b) Calculate the weighted average packaging cost for each model sold on the domestic market
  - (c) Calculate the weighted average packaging cost for each model exported to Australia

Both domestic and export sales are packed in the same manner. [REDACTED]



[REDACTED]

### E-3 Delivery

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

Yes. For domestic sales there are three (3) types of transportation cost. They are:

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]

[REDACTED]

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

Australian customer terms are [REDACTED].

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?

[REDACTED], are set out in **Confidential Attachment D 02 (Inland Transport)**.

Please refer to **Confidential Attachment D 02 (Inland Transport)**, which sets out the calculation of the per-unit amount for inland transport and a description of the nature of the expenses.

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?

The ocean freight cost that AFEM has reported covers:

- (i) [REDACTED]
- (ii) [REDACTED]
- (iii) [REDACTED]

These expenses are computed based on actual invoice received from AFEM's freight forwarders.

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?

AFEM has applied the rate as specified in [REDACTED]. Please see **Confidential Attachment E-3.5** [REDACTED].

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?

N/A

### 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.

Yes, [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?
  - 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?

Yes. There is no VAT for export sales, but domestic sales are subjected to 10% VAT.

VAT is accounted for as follows:

- [REDACTED];
- VAT reporting – this involves RAK prepares VAT summary (VAT output, input, offshore & others) on a monthly basis, based on the transaction recorded in the SAP system. Afterwards, RAK prepares a VAT return, and any VAT underpayment is settled based on the return.

[REDACTED]

[REDACTED]

3. Are there any other direct selling expenses incurred by your company in relation to domestic sales of like goods?
- These direct selling expenses must be included in the reconciliation of direct selling expenses in B-5

No

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

AFEM incurs and pays transportation fees to its freight forwarding/logistics firms, [REDACTED]. These companies arrange all transportation of the goods [REDACTED].

Fees for shipping are incurred on a [REDACTED].

[REDACTED] provides handling services and charges [REDACTED] per container.

[REDACTED]

A handling fee of US\$12 is charged by [REDACTED] on a per container basis. There are also auxiliary charges by DHL. For example, bill of lading fees, export clearance fees, shipping certificate, telex release fee, etc.

**E-5 Other adjustment claims**

1. Are there any other adjustments required to ensure a fair comparison between the export price and the normal value (based on domestic sales, costs and/or third country sales)? If yes, provide details.
  - An adjustment will only be made where there is evidence that the difference affects price comparability.
  - Refer to Chapter 15 of the *Dumping and Subsidy Manual (November 2018)* for more information.

No

## 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.

No. The sales processes to third countries are not different to the sales process for exports to Australia.

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.

Yes. [Redacted]

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?

The date of sale is taken to be the date of invoice.

### 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 review 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.

The date of sale is the date on which AFEM issues its invoice.

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

Column heading	Source of data
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]
[Redacted]	[Redacted]

### 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.

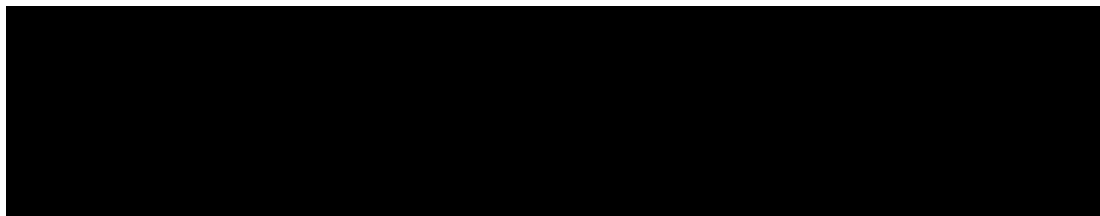
Prices in sales to different markets and to different customers in those markets vary depending on market circumstances, terms of trade (including freight term), mix of customers, volume, etc. It is not possible to identify and account for all differences in sales to third countries which would affect their comparison with export sales to Australia. This also would be the case for Australia. Sales

to both third countries and to Australia are in competitive markets and are subject to the usual conditions and 'ebb and flow' of a competitive market.

## SECTION G COST TO MAKE AND SELL

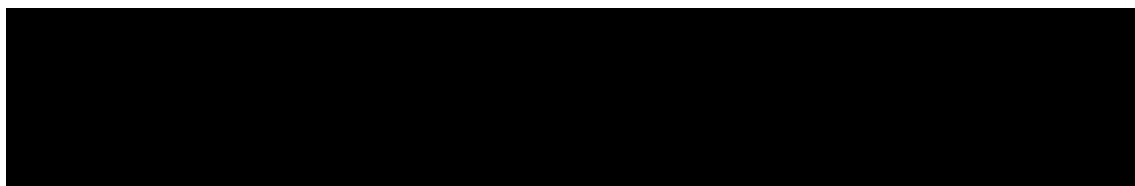
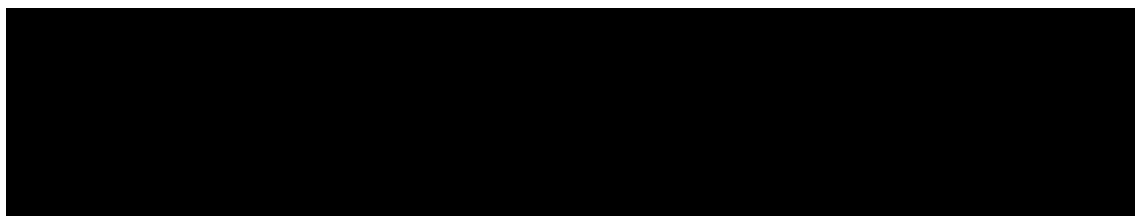
### G-1 Production process

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.



[Confidential Information Deleted – information on production processes including diagram of such processes]

RAK utilizes an integrated production process to produce the goods.



[Confidential Information Deleted – confidential information on production processes]

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.

Yes. See above.

### G-2 Cost accounting practices

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

RAK utilizes a process costing system for cost accounting purposes. The cost accounting system is maintained in [REDACTED] and fully integrated with the companies' financial accounting systems. It records the [REDACTED] production costs which are then X [REDACTED] uploaded to the financial accounts.

2. If your company uses standard costs:
  - (a) Were standard costs used as the basis of actual costs in your responses G-3.1 and 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 review period.

RAK tracks production costs on an actual and standard basis in the cost accounting system albeit on different levels of specificity [REDACTED]

The actual costs of raw materials consumed are also recorded [REDACTED]. This information is subsequently recorded in the financial accounting system and used to calculate the cost of goods sold.

There were no significant or unusual variances that occurred during the review period.

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.

Yes. RAK accumulates production costs in both direct and indirect cost centres. The direct cost centres represent the major processes through which the subject merchandise is transformed into the finished product. The conversion costs are accumulated in the direct cost [REDACTED]

[Confidential Information Deleted – confidential information on cost centres and codes]

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

In the normal course of business, RAK relies on [REDACTED] product code numbers for the purpose of production and cost accounting. The SKU number is the same product identifier used for sales purposes. The SKU product code identifies various key characteristics of the paper including the paper type, whiteness and density (gsm). Production costs are recorded on a SKU product code basis in the cost accounting system.

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

Production costs are valued the same for both cost accounting purposes and financial accounting purposes.

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.

No.

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)?

A [REDACTED] is used.

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

Damaged or substandard goods are valued at either actual costs of production or the net realisable value on the market, whichever is lower.

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

No by-products or joint products are derived from the production process. Any paper scrap is collected and reintroduced back into the production process. Scrap is not separately costed if reused in production. If scraps (if any) are sold, the sales revenue is recorded as other revenue in the income statement.

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

[REDACTED] and [REDACTED] charged management fees to RAK during the review period. In 2019, the management fee amounts were:

Vendor Name	Cost center	Cost center name	Curry	Amount
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[

### G-3 Cost to make on domestic market

- Complete the worksheet named "G-3 Domestic CTM".
  - This worksheet lists the quarterly cost to make the domestic models of like goods by MCC manufactured within the review period, even if they are models not exported to Australia.
  - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
  - 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 review period.

See Confidential Attachment G-3 (Domestic CTM)

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



### **G-3.A Cost to make pulp**

1. Complete the worksheet named "G-3.A Domestic CTM - Pulp" if you are a fully integrated producer using self-produced pulp to manufacture A4 copy paper. This worksheet is for reporting of your costs of converting wood chips to pulp. This spreadsheet should feed into the raw material costs to manufacture A4 copy paper (G-3 Domestic CTM).
  - Raw material costs should be reported at the wood chip level in this worksheet.
  - This worksheet lists the monthly cost to make pulp used in the manufacture of domestic A4 copy paper within the review period, even if the A4 copy paper models are not exported to Australia.
  - 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 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, e.g., 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 months 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 review period.

See [Confidential Attachment G-3.A \(Cost to make pulp\)](#).

### **G-3.B Cost to make wood chips**

1. Complete the worksheet named "G-3.B Domestic CTM - Wood Chip" if you are a fully integrated producer using self-produced wood chips to manufacture A4 copy paper. This worksheet is for reporting of your costs of converting logs to wood chips. This spreadsheet should feed into the raw material costs to manufacture pulp (G-3.A Domestic CTM Pulp).
  - Raw material costs should be reported at the log level in this worksheet.
  - This worksheet lists the monthly cost to make wood chips used in the manufacture of domestic A4 copy paper within the review period, even if the A4 copy paper models are not exported to Australia.
  - 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 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, e.g., 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 months 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 review period.

See [Confidential Attachment G-3.B \(Cost to make wood chips\)](#).

### **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 review 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.

[See Confidential Attachment G-4 \(General & Administration Expenses\).](#)

2. Complete the worksheet named "G-4.2 Domestic SG&A calculation".
  - This worksheet calculates the unit domestic SG&A for each MCC.
  - You must provide this list in electronic format using the template provided.
  - Please use the formulas provided.

## **G-5 Cost to make the goods exported to Australia**

1. Complete the worksheet named "G-5 Australian CTM".
  - This worksheet lists the quarterly cost to make the Australian models of the goods under consideration by MCC manufactured within the review period.
  - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each MCC.
  - 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 review period.

[See Confidential Attachment G-5 \(Australian CTMS\).](#)

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

### **G-5.A Cost to make pulp**

1. Complete the worksheet named "G-5.A Australian CTM - Pulp" if you are a fully integrated producer using self-produced pulp to manufacture A4 copy paper. This worksheet is for reporting of your costs of converting wood chips to pulp. This spreadsheet should feed into the raw material costs to manufacture A4 copy paper (G.5 Australian CTM).
  - Raw material costs should be reported at the wood chip level in this worksheet.
  - This worksheet lists the monthly cost to make pulp used in the manufacture of Australian exported A4 copy paper within the review 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 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, e.g., 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 review period.

[See Confidential Attachment G-3.A \(Cost to make pulp\).](#)

### **G-5.B Cost to make wood chips**

1. Complete the worksheet named "G-5.B Australian CTM – Wood Chip" if you are a fully integrated producer using self-produced wood chips to manufacture A4 Copy paper. This worksheet is for

reporting of your costs of converting logs to wood chip. This spreadsheet should feed into the raw material costs to manufacture pulp (G-5.A Australian CTM – Pulp).

- Raw material costs should be reported at the log level in this worksheet.
- This worksheet lists the monthly cost to make wood chips used in the manufacture of A4 copy paper exported to Australia within the review 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 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, e.g., 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 review period.

See [Confidential Attachment G-3.B \(Cost to make wood chips\)](#).

## G-6 Cost allocation methodology

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



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

See above.

## G-7 Major raw material costs

1. For each major raw material (pulp, wood chips or logs) which individually account for 10% or more of the total cost to make, complete the worksheet named "G-7 Raw material purchases".
  - This worksheet lists all raw material purchases (i.e. transaction by transaction) purchased by your company within the review 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.
2. Provide a table listing the source of the data for each column of the "G-7 Raw material purchases" listing.
3. 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 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.
4. Are any of the suppliers in "G-7 Raw material purchases" listing related to your company? If yes, please provide details on how the price is set.

See [Confidential Attachment G-7 \(Raw material purchase\)](#).

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

See [Confidential Attachment G-8 \(Upward Cost\)](#).

## **G-9 Capacity Utilisation**

4. Please complete the worksheet named "G-9 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.

See [Confidential Attachment G-9 \(Capacity Utilisation\)](#).

## **G-10 Profit Adjustment**

1. In the event that the Commission were to use a benchmark cost, please specify a relevant profit that should be deducted from the benchmark price to establish a benchmark cost at either the cost of wood chips or pulp. In specifying the relevant profit, explain why this would be an appropriate profit margin to use.

[No response required at this time.](#)

## SECTION H MARKET SITUATION

APRIL sets out below its overall response to Sections H to L (collectively) of the Exporter Questionnaire (Indonesia) below, which is supplemented by any response to a particular question in Sections H to L of the Exporter Questionnaire (Indonesia). If the Commissioner considers that APRIL's response is inaccurate, in whole or in part, or further clarification is required, please provide details, so that APRIL may provide the necessary clarification.

Absent the Commissioner indicating how and to what extent any of APRIL's summary is inaccurate and/or its reasons are inaccurate, it will be taken that the Commissioner accepts that this summary is accurate.

**1. APRIL's unequivocal position is that the addition of Sections H to L to the Exporter Questionnaire (Indonesia) is unnecessary, irrelevant and unfair for the reasons set out below.**

**1.1 Unlike other countries, Indonesia has been burdened with additional questions**

- a. Indonesian exporters have been unfairly burdened with additional Sections H to L without good reason and without consultation with relevant interested parties (i.e. Indonesian exporters) . On the other hand, these Sections have not been added to the Exporter Questionnaires for exporters in other countries that also are the subject of ADC Review No. 551.
- b. Having added this additional burden on Indonesian exporters, the Commissioner has not even granted Indonesian exporters extra time to complete responses to the Exporter Questionnaire (Indonesia), particularly since there is a considerable amount of information that these additional questions seek to obtain and the consequent onerous obligation imposed on the Indonesian exporters to respond these Sections.

**1.2 Sections H to L of the Exporter Questionnaire (Indonesia) are completely irrelevant to ADC Review No. 551**

- a. They do not help the Commissioner to determine Australian Paper's purpose for pursuing this review.
  - i. The Commissioner in initiating this review accepted Australian Paper's contentions that the normal values and export prices of A4 Copy Paper exported by APRIL from Indonesia to Australia have changed and increased in their respective amounts. On this basis, the sole purpose of ADC Review No. 551 in APRIL's case, is for the Commissioner to assess whether the said variable factors (i.e. normal value and export prices) of the anti-dumping measure applicable to APRIL's exports of A4 Copy Paper to Australia from Indonesia during the review period have indeed changed since the original investigation and, if so, to what extent.
  - ii. Given the clear purpose of ADC Review No. 551 in relation to APRIL's exports of A4 Copy Paper from Indonesia to Australia, there is no good basis why Sections H to L have been added to the Exporter Questionnaire (Indonesia) because they do not help the Commissioner to determine Australian Paper's reason for pursuing this review.
- b. Australian Paper did not raise the issues of Particular Market Situation and Proper Comparison in its application nor did the Commissioner when he initiated this review.
  - i. Even if we take the commentary in Sections H to L to indicate that these additional questions have been added to the Exporter Questionnaire (Indonesia) to address

the issues of 'particular market situation' and 'proper comparison'<sup>3</sup>, this was again not the issue raised by Australian Paper in its current application. This to be contrasted with its previous application for the imposition of anti-dumping measures on exports of A4 Copy Paper from, amongst other countries, Indonesia in which it was claimed that a 'particular market situation' existed in Indonesia. This issue was subsequently investigated in the original dumping investigation (Investigation No. 341) and a 'particular market situation' was found to exist during the then period of investigation.

- ii. It is clear that Australian Paper, in making its application for this review, considers that whether a 'particular market situation' currently exists in relation to the Indonesian A4 Copy Paper market is no longer relevant. Accordingly, as evidenced by its application, the methodology for determining the normal value of APRIL's exports should now be based on the price at which A4 Copy Paper is sold by APRIL in Indonesia. Neither did Australian Paper claim in its application that there existed any other fact or circumstance that precluded a 'proper comparison' between APRIL's prices of A4 Copy Paper sold in domestic and export sales.
  - iii. This was accepted by the Commissioner, who initiated ADC Review No. 551 on this basis. See Consideration Report No. 551 (CON 551) dated 16 April 2020 and Anti-Dumping Notice (ADN) No. 2020/039 dated 16 April 2020.
  - iv. If Australian Paper wishes these issues to be considered in a review of the variable factors of the anti-dumping measures applying to exports of A4 Copy Paper from Indonesia, it should withdraw its application and submit a fresh application in which it properly raises these issues. Absent that, there is no lawful basis for including the questions in Sections H to L of the Exporter Questionnaire (Indonesia). Sections H to L are, therefore, irrelevant to this review and should be disregarded.
- c. Even if Australian Paper raised the issues of Particular Market Situation & Proper Comparison, WTO jurisprudence provide clear guidance that the issues of 'particular market situation' and 'proper comparison' have no relevance to the review of the variable factors of APRIL's exports of A4 Copy Paper from Indonesia to Australia and hence the information sought in Sections H to L are wrong.
- i. Relevant jurisprudence includes the reasoning, findings and decisions of the WTO Panel and/or Appellate Body in not only '*Australia – A4 Copy Paper*' but also '*EU – Biodiesel (Argentina)*' (WT/DS473/AB/R) (6 October 2016), '*EU – Biodiesel (Indonesia)*' (WT/DS480/R) (25 January 2018) and '*US – OCTG (Korea)*' (WT/DS488/R) (14 November 2017).
  - ii. A summary of the reasoning, findings and decisions of the WTO Panel and/or Appellate Body in these WTO Disputes on the issues of 'particular market situation' and 'proper comparison', which essentially involved the operation of Article 2.2 of the WTO Anti-Dumping Agreement ("**Article 2.2**") is set out below:
    - (1) Article 2.2 does not limit the source of information for use in determining the cost of production in the country of origin, that is, it can be from a source in the country of origin or in another country;
    - (2) an investigating authority, such as the Commissioner, must ensure that the information used reflects the 'cost of production in the country of origin' and, to achieve this, that information may need to be appropriately adapted;
    - (3) if the information required for the purpose of determining the cost of production in the country of origin was available from the records of the exporter, then the investigating authority has no legal basis for it to use third country export prices

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<sup>3</sup> especially following the reasoning and findings of the WTO Panel in '*Anti-Dumping Measures on A4 Copy Paper*' (WT/DS529/R) (4 December 2019) ('*Australia – A4 Copy Paper*'),

- in substitution for the exporter's costs of production in calculating a normal value under Article 2.2, and to do so is inconsistent with Article 2.2;
- (4) if the information required to determine the cost of production of a product is not contained in or is unavailable from the exporter's records, then recourse may be had to obtaining information from other sources; from which particular source that information is obtained is a matter for decision by the investigating authority but, in any event, it must reflect the 'cost of production in the country of origin';
  - (5) under Article 2.2, where either of the circumstances specified in that Article are satisfied, then there are two (2) methods for determining a normal value; which method an investigating authority selects is a matter for the investigating authority but it must establish its criteria justifying its selection of a particular methodology for determining a normal value;
  - (6) the phrase 'particular market situation' does not have to be defined in a manner that envisages all possible situations that would prevent a 'proper comparison' between domestic and export prices;
  - (7) a 'particular market situation' is only relevant if a circumstance giving rise to the finding of a 'particular market situation' renders sales in the country of export 'unsuitable' for determining a normal value where it precludes a 'proper comparison' between domestic and export prices (i.e. between the normal value and export prices). If domestic sales 'do permit a proper comparison' with export prices, that is, they are 'suitable' for determination of a normal value for this purpose, then those sales cannot be disregarded as the basis for determining a normal value, regardless of the existence of a 'particular market situation';
  - (8) a 'low-priced' input to manufacture for whatever reason that affects the cost of production of a product for sale in both the domestic and export markets does not necessarily affect 'prices' of that product in such sales in the domestic and export markets equally. That is a matter for determination by an exporter having regard to conditions in the relevant domestic and export markets;
  - (9) the effect of a low price of an input to manufacture due to whatever reason on the domestic and export prices of an exporter would depend on a variety of factors, such as the relationship between cost and prices and competitive conditions in the domestic and export market in question, all of which would need to be examined to determine the suitability of domestic sales and whether there was a factor in such sales that precluded a 'proper comparison' with export prices;
  - (10) an examination of whether a 'proper comparison' is permissible requires examination of both export sales and domestic sales and not just the suitability of domestic sales; and
  - (11) finally, the WTO Panel found in '*Australia – A4 Copy Paper*' that:

*"We find a deficiency in the ADC's examination in this case because it focused exclusively on the domestic sales and domestic prices, without taking into account the export prices with which the domestic prices would be compared. In particular, the examination does not address the question whether the domestic prices could be properly compared with the export prices despite the effects of the particular market situation."* (at paras. 7.87 and 7.89) (underlining added)

- iii. Based on the above WTO jurisprudence, the issues of 'particular market situation' and 'proper comparison' are clearly irrelevant to the review of the variable factors of APRIL's exports of A4 Copy Paper from Indonesia to Australia because a finding that a 'particular market situation' exists does not of itself preclude a 'proper comparison' of domestic and export prices, as the WTO Panel found in '*Australia – A4 Copy Paper*'.
- iv. In the original investigation, APRIL's cost of production plus profit as detailed in its records and verified were used to calculate a constructed normal value, which normal value was compared with its export prices for A4 Copy Paper exported to Australia. There was no evidence that this constructed normal value was not the same as the

price at which APRIL sold A4 Copy Paper in Indonesia and no cost of an input to manufacture derived from an other source, including a 'benchmark' price of an input to manufacture, was substituted for the actual cost of an input to manufacture set out in APRIL's records.

- v. In other words, whichever methodology could have been used and was used in the original investigation to determine the normal value of APRIL's exports of A4 Copy Paper to Australia from Indonesia, the result would be the same and was appropriate for use in a comparison with export prices and was so used. Consequently, there were no grounds that precluded a 'proper comparison' between prices in domestic, or a constructed normal value based on the actual cost of production, and export sales in the original investigation.
- vi. Nothing has changed since then. The sources of inputs to manufacture are the same, the pricing of such inputs to manufacture remain the same, the production processes for the production of A4 Copy Paper by APRIL using those inputs to manufacture and, therefore, the kinds of costs it incurs in such production remain the same. Nothing has been raised by either Australian Paper in its application for this review or by the Commissioner in initiating this review or, for that matter, in Sections H to L that indicates that 'prices' of A4 Copy Paper sold by APRIL in the Indonesian A4 Copy market are 'unsuitable' for use in a comparison with APRIL's export prices of A4 Copy Paper exported from Indonesia to Australia.
- vii. Further, the prices at which APRIL sells A4 Copy Paper in domestic and export markets are not affected differently by the cost of production. The cost of production affects the prices of the A4 Copy Paper APRIL sells in domestic and export markets in the same manner and equally. Any differences in such prices are due to the usual market conditions in open competitive markets. The sale of A4 Copy Paper by APRIL in domestic and export markets are negotiated at arm's length with unrelated customers on the usual terms and conditions applying to the A4 Copy Paper industry in the domestic and export markets and in competition with other suppliers of A4 Copy Paper in those markets free, in so far as APRIL is aware, from any governmental influence or involvement affecting market conditions.
- viii. In these circumstances, whether a 'particular market situation' exists in relation to Indonesia's A4 Copy Paper market is irrelevant in so far as the review of the variable factors of APRIL's exports of A4 Copy Paper to Australia is concerned. Similarly, whether a 'proper comparison' between a normal value however determined (i.e. based on 'prices' in sales of A4 Copy Paper by APRIL in Indonesia or based on a constructed normal value using the actual cost of production of A4 Copy Paper by APRIL for both domestic and export sales) is essentially an irrelevant consideration because self-evidently such a comparison can be undertaken as it is not precluded.
- ix. Importantly, no one, either in the original investigation or since, including the Commissioner has identified a factor present in domestic sales, whether arising from a finding of a 'particular market situation' or otherwise, that would preclude a 'proper comparison' between domestic and export prices. As it is not known what such a factor is or could be, it is not possible to identify what factor or factors present in the Indonesian A4 Copy Paper market or in sales by APRIL would render its sales 'unsuitable' as a basis for a normal value for a 'proper comparison' with its export prices.
- x. Consequently, Sections H to L of this Questionnaire are irrelevant to APRIL's circumstance in relation to this review of its variable factors. That is, there is no factor or circumstance in relation to the Indonesian A4 Copy Paper market or sales by APRIL in that market that renders sales by APRIL of A4 Copy Paper in that market 'unsuitable' for determining a normal value as it would preclude a 'proper comparison' between that normal value and APRIL's export prices.

## 2. Response to the Questions in Sections H to L of this Questionnaire



**2.1 In response to the questions in Sections H to L of this Exporter Questionnaire (Indonesia), APRIL's response is that, for the purposes of section 269TAC(2)(a)(ii) of the *Customs Act 1901*, in so far as APRIL is aware there are no facts or circumstances that render sales of A4 Copy Paper in Indonesia or sales of A4 Copy Paper for export to Australia by APRIL unsuitable for use in determining normal values for comparison with export prices of sales of A4 Copy Paper by APRIL. In particular:**

- a. APRIL and its related bodies corporate are privately owned and operated companies and the Government of Indonesia holds no equity or other interest in any of these companies. The Government of Indonesia also does not appoint any directors to the board of directors of those companies or personnel in the management of those companies;
- b. as far as APRIL is aware, no director or other officer of APRIL or senior manager of APRIL holds an official position in the Government of Indonesia;
- c. neither APRIL nor its related bodies corporate are subject to, or have been subject to, the control or direction by the Government of Indonesia in the production and/or sale of A4 Copy Paper in Indonesia or for export to Australia during the review period;
- d. in so far as APRIL is aware, the Indonesian market for A4 Copy Paper is a competitive market where prices are set by market forces uninfluenced by the Government of Indonesia, either directly or indirectly, otherwise than is usual and typical for governments to influence industries and markets through government policies and regulation such as those that exist in Australia;
- e. prices of A4 Copy Paper sold by APRIL in Indonesia are governed by competitive market prices in the Indonesian A4 Copy Paper market negotiated at arms length with buyers in competition of other suppliers of A4 Copy Paper in Indonesia;
- f. sales of A4 Copy Paper by APRIL in Indonesia to its customers are to unrelated parties on arm's length transactions on commercial terms and conditions;
- g. A4 Copy Paper sold by APRIL in Indonesia recover APRIL's cost to manufacture and sell A4 Copy Paper plus include an amount for profit and prices, which prices are agreed with buyers through arm's length negotiations in competition with other suppliers of A4 Copy Paper in Indonesia's A4 Copy Paper market. Consequently, such prices are competitive market prices;
- h. the Government of Indonesia's involvement in the Indonesian A4 Copy Paper market, whether through government regulation or government policies, is no more or less than any other government, including Australian federal and/or state and territory governments and is for the same or similar governmental purposes and objectives as for governments in other countries, including Australia (e.g. development of domestic industries, promotion of investment in domestic industries, promotion of employment in Indonesia, protection of the environment, promotion of occupational health and safety, development of infrastructure and, of course, addressing health, education, national security and undertaking other similar traditional governmental functions and services);
- i. the nature and extent of the Government of Indonesia's involvement in and regulation of the forestry industry and the paper industry in Indonesia no doubt will be provided by the Government of Indonesia as it did in the original investigation, including whether there have been any material changes to the information it provided in the original investigation. Such information is also available on Government of Indonesia websites (e.g. <https://indonesia.go.id/>) and see also the APEC website (<https://www.apec.org/>);

- j. the Government of Indonesia, as far as APRIL is aware, does not control or otherwise influence the price of inputs to manufacture A4 Copy Paper, including the price of wood chips and pulp, either directly or indirectly, whether by leasing land or through export controls on logs or otherwise;
- k. in so far as APRIL is aware, there is no reason or purpose for the Government of Indonesia to control or otherwise influence the price of inputs to manufacture in the production of A4 Copy Paper, including pulp, or the price of A4 Copy Paper in Indonesia otherwise than the usual government purposes a government has in promoting domestic industries, protecting the environment, promoting employment and investment in domestic industries and the like and it has no evidence of any other reason or purpose;
- l. as APRIL is aware, RAK produces A4 Copy Paper in Indonesia for the domestic market and for supply to related bodies corporate who export the A4 Copy Paper to their respective customers in export markets. That is, RAK does not itself export A4 Copy Paper from Indonesia, in particular to Australia, and has no customers in export markets. Information regarding the production of A4 Copy Paper, including the cost of production, and domestic and export sales of A4 Copy Paper is set out in detailed responses to earlier Sections of this Exporter Questionnaire (Indonesia) such as, Sections B, D and G;
- m. RAK is a vertically integrated company and sources its requirements of raw materials for the production of A4 Copy Paper internally and not from third party suppliers and at transfer prices that are comparable to globally competitive prices as the Commissioner found and verified in the original investigation;
- n. the production processes and production costs for A4 Copy Paper for sale in Indonesia and for export to Australia are identical and are produced from the same inputs to manufacture and using the same equipment. Accordingly, there is no difference in the cost of production of A4 Copy Paper produced by APRIL for sale in the Indonesian market and for export, including sales to Australian customers for export to Australia;
- o. information and evidence in relation to the production and sale of A4 Copy Paper by APRIL in Indonesia and for export to Australia are set out in Sections B, C, D and G of this Exporter Questionnaire (Indonesia);
- p. APRIL does not sell A4 Copy Paper in the Australian A4 Copy Paper market directly and, consequently, has only limited information concerning that market and its views regarding that market would be speculative and of limited, if any, relevance to this review. Factual information concerning the Australian A4 Copy market, supported by evidence, should be obtained from participants in that market such as producers, importers, distributors, resellers and the like;
- q. however, APRIL does make the following observations in relation to the Australian A4 Copy Paper market. As is public knowledge and as Australian Paper itself acknowledged in its application for initiation of this review, it holds a market share of approximately 85% of the Australian A4 Copy Paper market. With a monopoly or near monopoly position in the Australian A4 Copy Paper market, it dominates that market. With such dominance, the question naturally arises as to whether the Australian A4 Copy Paper market is a 'competitive market' subject to the usual market conditions of supply and demand and competition among suppliers to that market. Consequently, the pertinent question is whether imports of A4 Copy Paper can compete with Australian Paper and, if so, what is or are the point or points of competition, at what prices, etc. These issues are relevant factors for consideration in assessing material injury or threat thereof and causation;

- r. further, it is publicly acknowledged, including by Australian Paper, that the forestry and paper industries are among the most regulated industries in Australia. Has the effect of such regulation influenced the price of inputs to manufacture such as the price of pulp and energy and, has this resulted in the distortion of A4 Copy Paper prices in Australia (either artificially increased or lowered those prices than they would have been without that extent of government regulation)? Has this been investigated? If not, why not?
- s. the regulation of the Australian A4 Copy Paper market by Australian governments, including regulation of the Australian forestry and paper industries, can readily be obtained from the Department of Industry, of which the Anti-Dumping Commission is part, the Australian Tax Office, the Australian Consumer and Competition Commission, the Productivity Commission and their State and Territory counterparts, and other Federal, State, Territory and local government agencies, including from publicly available documents and legislation available on their respective websites (see, for example:

<https://www.business.gov.au/Planning/Industry-information/Forestry-industry>

<https://www.vic.gov.au/victorian-forestry-plan>

<https://www.safeworkaustralia.gov.au/collection/forestry-operations-guidance-material>

<http://agriculture.vic.gov.au/agriculture/forestry>

<https://www.vic.gov.au/forestry-industry-council>

- t. also, it is claimed that the Australian A4 Copy Paper market is 'price sensitive' . If the Australian A4 Copy Paper market is 'price sensitive', why have exporters, such as exporters from Brazil Indonesia, China and Thailand, been able to increase their respective export prices to Australia but Australian Paper apparently has not been able to increase its prices to recover increased costs, such as for pulp and energy, despite its dominant position in the Australian A4 Copy Paper. This would evidence that the so-called 'price sensitivity' of the Australian A4 Copy Paper market is driven by factors other than by export prices to Australia. Due to the point of competition in the Australian A4 Copy Paper market between exports to Australia and Australian Paper's products being lower down the supply chain than the point of importation, exports do not compete with Australian Paper on price. Rather, competition with Australian Paper in relation to 'price' amongst other things would include an importer's, distributor's, reseller's, etc., amounts for administration and selling costs and expenses plus an amount for profit in addition to the purchase price paid to an exporter for the A4 Copy Paper being sold by such entities in the Australian market. Consequently, injury to Australian Paper is being caused by other factors and not by exports, whether at dumped or undumped prices.

- 2.2 APRIL also raised with the Commissioner a number of matters concerning Sections H to L of the Exporter Questionnaire (Indonesia) and requested clarification from the Commissioner on those matters to assist APRIL in responding to this Questionnaire. A copy of that request is attached to this response to the Questionnaire. No substantive response to that request was received from the Commissioner prior to the due date for APRIL's response to the Exporter Questionnaire (Indonesia).**

### **Instructions**

This section includes questions raised in the original investigation (Investigation 341) and new questions raised in relation to this review. As questionnaires are constantly improved over time, the

wording of questions in the original investigation may not be the same and should be carefully read.

Where applicable, there will be two response sections. These are:

- **Questions from the original investigation**  
This section provides an opportunity for your company to affirm responses made in the original investigation or to provide an updated response with further information. If your company's response has changed, please provide an updated response with supporting documents.
- **New questions for this review**  
This section provides an opportunity for your company to respond specifically to the questions in the context of this review. If there is no change from the original questionnaire response, please indicate so.

In the original investigation, information was provided by exporters in relation to certain countervailable subsidy programs alleged by the applicant. The Commissioner of the Anti-Dumping Commission ultimately terminated the subsidy aspect of the investigation. Some of the information provided by exporters in relation to these questions relate to the market situation assessment completed by the Commission in the original investigation. The questions from the original questionnaire relevant to the market situation assessment are below.

It may be necessary for the Commission to request additional information following receipt and review of your response.

There are six parts to this section:

- PART H-1** Requests information concerning the organisation of your company and the Government of Indonesia's involvement in the business of your company.
- PART H-2** Requests information concerning the Government of Indonesia's measures with respect to the A4 copy paper industry in Indonesia.
- PART H-3** Requests information concerning the A4 copy paper sector in the region where your company is located.
- PART H-4** Provision of standing timber for less than for less than competitive market prices.
- PART H-5** Log export ban
- PART H-6** Market situation findings in Investigation 341

## H-1 General information

The information requested in this part will provide an overview of your corporate organisation and the Government of Indonesia's involvement in your business. In addition to your response to each of the questions, all necessary supporting documentation is requested.

1. Specific questions are asked throughout this questionnaire in relation to the Government of Indonesia's interaction with your businesses. However, please generally describe all interaction that your business has with the Government of Indonesia at all levels, including (but not limited to):
  - (a) reporting requirements;
  - (b) payment of taxes;
  - (c) senior management representation within your business;
  - (d) approval/negotiation of business decisions (e.g. investment decisions, management decisions, pricing decisions, production decisions, sales decisions);
  - (e) licensing;
  - (f) restrictions on land use;
  - (g) provision of loans; and
  - (h) provision of grants, awards or other funds.

**Response from the original investigation questionnaire response**

[Detail any further updated response to that provided in the original questionnaire response]  
 [If no change, confirm so]

[See response at commencement of Section H.](#)

**Response for this review**

[Provide your response and/or further information here]  
 [If there has been no change to the original questionnaire response, confirm so]

[See response at commencement of Section H.](#)

2. Business structure, ownership and management
  - (a) Indicate whether your company is a state-owned or state-invested enterprise (SIE) (refer to the Glossary of Terms for definition).
  - (b) List the Board of Directors and Board of Shareholders of your business and all other entities/businesses your business is related to. Indicate the names of common directors and officers between yours and related businesses, where applicable.
  - (c) Are any members of your business' (and/or all other entities your business is related to) Board of Directors or Board of Shareholders representatives, employees, or otherwise affiliated with the Government of Indonesia (at any level, from any agency, or otherwise associated entity)? If yes, identify the individuals, their role on that Board and their affiliation with the Government of Indonesia.
  - (d) Are any members of your business' (and/or all other entities your business is related to) Board of Directors or Board of Shareholders appointed, managed or recommended by the Government of Indonesia? If yes, identify any relevant government department(s) they are affiliated with.
  - (e) Indicate who owns what percentage of all shares in your business and identify whether they are:
    - an affiliate, representative, agency or otherwise representative of the Government of Indonesia;
    - employees of your business;
    - foreign investors; or
    - other (please specify).
  - (f) Provide the details of any significant changes in the ownership structure of your business during the [original] investigation period.
  - (g) Identify any positions within your business that are appointments or designated to act on behalf of Government of Indonesia authorities.
  - (h) Explain whether there are requirements in law and in practice to have government representation at any level of your business. If there is such a requirement, explain the role of government representatives appointed to any level of your business.
  - (i) If your business is a publicly-traded company, what are the rules regarding the issuance of shares by your business? Identify any stock exchanges on which your business is listed.
  - (j) Provide the monthly trading volume and average monthly trading price of your listed security between 1 January 2015 and 31 December 2015.

- (k) Who has the ability to reward, fire or discipline your business' senior managers?
- (l) Do any of your company's senior managers hold positions in any Government of Indonesia departments or organisations, associations or Chambers of Commerce? If so describe the nature of these positions.
- (m) Provide the names and positions of your company's pricing committee.

<b>Response from the original investigation questionnaire response</b>
<p>[Detail any further updated response to that provided in the original questionnaire response]            [If no change, confirm so]</p> <p><a href="#">See response at commencement of Section H.</a></p>

<b>Response for this review</b>
<p>[Provide your response and/or further information here]            [If there has been no change to the original questionnaire response, confirm so]</p> <p><a href="#">See response at commencement of Section H.</a></p>

### 3. Licensing

- (a) Provide a copy of your business license(s).
- (b) Identify the Government of Indonesia departments or offices responsible for issuing the license(s).
- (c) Describe the procedures involved in applying for the license(s).
- (d) Describe any requirements or conditions that must be met in order to obtain the license(s).
- (e) Describe and explain any restrictions imposed on your business by the business license(s).
- (f) Describe any sanctions imposed on your business if you act outside the scope of your business license(s).
- (g) Describe and explain any rights or benefits conferred to your business under the license(s).
- (h) Describe the circumstances under which your business license(s) can be revoked, and who has the authority to revoke the license(s).

<b>Response from the original investigation questionnaire response</b>
<p>[Detail any further updated response to that provided in the original questionnaire response]            [If no change, confirm so]</p> <p><a href="#">See response at commencement of Section H.</a></p>

<b>Response for this review</b>
<p>[Provide your response and/or further information here]            [If there has been no change to the original questionnaire response, confirm so]</p> <p><a href="#">See response at commencement of Section H.</a></p>

4. Decision-making, planning and reporting
- (a) Provide a description of your business' decision-making structure in general and in respect of paper products. This should identify the persons or bodies primarily responsible for deciding:
    - (i) what goods are produced;
    - (ii) how the goods are produced;
    - (iii) how levels of inputs such as raw materials, labour and energy are set and secured;
    - (iv) how the use of your outputs, such as how your product mix is determined; and
    - (v) how your business' profit is distributed, etc., is determined.
  - (b) Provide a description of any Government of Indonesia input into the decision-making process relating to your manufacture, marketing and sale of A4 copy paper.
  - (c) Provide a list of all government departments/offices that are involved, either directly or indirectly, in your manufacture, sale or purchase of A4 copy paper.
  - (d) List and describe all reports that must be submitted to the Government of Indonesia periodically by your company, and identify the government department/office where each report is filed.
  - (e) Provide copies of the minutes of your Board of Directors and Board of Shareholders meetings over the [original] investigation period.
  - (f) Provide copies of the notes to company meetings where pricing decisions on A4 copy paper have been made over the [original] investigation period.

<b>Response from the original investigation questionnaire response</b>
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[Detail any further updated response to that provided in the original questionnaire response]
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<a href="#">See response at commencement of Section H.</a>
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<b>Response for this review</b>
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[Provide your response and/or further information here]
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[If there has been no change to the original questionnaire response, confirm so]
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<a href="#">See response at commencement of Section H.</a>
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5. Financial and investment activities
- (a) How is your business debt funded? Provide a list of all major lenders.
  - (b) What is the rate of interest paid by your business on all debt instruments over the last five years?
  - (c) Has your business benefited from any concessional interest rates for your loans/debts in the last five years? If yes, provide details.
  - (d) Has your business raised any capital using issuance of shares, preferential shares, rights issue, bonds, warrants, debentures, sub-ordinate loans or any other debt and/or equity instruments in the last five years? If so:
    - (i) explain what instruments were used;
    - (ii) identify the type (e.g. government guarantee) and provider of the security; and
    - (iii) explain the reasons for raising the capital.
  - (e) Does your business have policies on how cash reserves are to be invested? If yes, provide details.

- (f) Has your business invested in either government or non-government debt securities (such as bonds, quasi-government bonds)? If so provide details (e.g. type of instrument, amount invested and the expected rate of return).

Response from the original investigation questionnaire response
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[Detail any further updated response to that provided in the original questionnaire response] [If no change, confirm so]
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<a href="#">See response at commencement of Section H.</a>
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Response for this review
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[Provide your response and/or further information here.] [If there has been no change to the original questionnaire response, confirm so]
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<a href="#">See response at commencement of Section H.</a>
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## H-2 Government of Indonesia measures in the pulp and paper sector

The information requested in this part will allow for a better understanding of the Government of Indonesia's measures in respect of A4 copy paper in Indonesia, in addition to your response to each of the questions, all necessary supporting documentation is requested.

1. Are there any Government of Indonesia opinions, directives, decrees, promulgations, measures, etc. concerning the pulp and paper industry/sector that were put in place or operating during the [original] investigation period [2015]? If yes, please provide a copy of that documentation and a translation as well. Also provide documentation concerning the Government of Indonesia or any association of the Government of Indonesia's notification of the measures concerning A4 copy paper to your company over the [original] investigation period [2015].

Response from the original investigation questionnaire response
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[Detail any further updated response to that provided in the original questionnaire response] [If no change, confirm so]
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<a href="#">See response at commencement of Section H.</a>
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Response for this review
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[Provide your response and/or further information here] [If there has been no change to the original questionnaire response, confirm so]
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<a href="#">See response at commencement of Section H.</a>
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2. Provide information concerning the name of any Government of Indonesia departments, bureaus or agencies responsible for the administration of all government measures concerning the A4 copy paper industry in the regions, provinces or special economic zones where your company is located. Ensure that your response includes contact information regarding the following areas:
  - industrial policy and guidance on the A4 copy paper sector;
  - market entry criteria for the A4 copy paper industry sector;
  - environmental enforcement for the A4 copy paper industry sector;
  - management of land utilization;
  - investigation and inspection of new A4 copy paper expansion facilities;
  - import licensing for raw materials relating to A4 copy paper manufacture.



**Response from the original investigation questionnaire response**

[Detail any further updated response to that provided in the original questionnaire response]  
 [If no change, confirm so]

[See response at commencement of Section H.](#)

**Response for this review**

[Provide your response and/or further information here]  
 [If there has been no change to the original questionnaire response, confirm so]

[See response at commencement of Section H.](#)

3. Has the Government of Indonesia designated your company and/or industry (i.e. forestry and pulp and paper) as “strategic,” “encouraged,” “priority,” or any other designation? If yes, please answer the following questions.
- Explain the purpose of these designations, the criteria for receiving any such designation, and the benefits or obligations that arise from each such designation.
  - Is there any connection between these designations and other industrial and/or economic policies or administrative measures?
  - Please describe any instances in which your company cited Government of Indonesia plans, policies, or measures as support for receiving the financing that you report.

**Response from the original investigation questionnaire response**

[Detail any further updated response to that provided in the original questionnaire response]  
 [If no change, confirm so]

[See response at commencement of Section H.](#)

**Response for this review**

[Provide your response and/or further information here]  
 [If there has been no change to the original questionnaire response, confirm so]

[See response at commencement of Section H.](#)

**H-3 The A4 copy paper sector**

The information requested in this part will assist in providing a better understanding of the Government of Indonesia measures and your business’ sales and production of A4 copy paper. In addition to your narrative response to each of the questions, all necessary supporting documentation is requested.

## 1. Taxation

- Were there any export taxes on the exports of A4 copy paper during the [original] investigation period [2015]?
- What was the value-added tax (VAT) rebate applicable to A4 copy paper exports during the [original] investigation period [2015]?
- Have there been any changes to the VAT rebate applicable to A4 copy paper exports in the last five years? If yes, provide:
  - a detailed chronological history of the VAT rebate rates;
  - products affected;
  - the effective dates of the rate changes;
  - fully translated copies of any Government of Indonesia notices regarding these changes, including the relevant appendices.

- (d) Are you aware of any tax changes being planned that would impact the A4 copy paper sector?

<b>Response from the original investigation questionnaire response</b>
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[Detail any further updated response to that provided in the original questionnaire response]
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<a href="#">See response at commencement of Section H.</a>
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<b>Response for this review</b>
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[Provide your response and/or further information here]
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[If there has been no change to the original questionnaire response, confirm so]
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<a href="#">See response at commencement of Section H.</a>
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2. Sales terms

- (a) Identify the person who authorises the sales terms, prices and other contract provisions for the sale of A4 copy paper by your business.
- (b) Explain how the selling prices of A4 copy paper by your business are determined, including any Government of Indonesia involvement in your business' pricing decisions, and indicate if the goods are subject to Government of Indonesia direct or indirect pricing or government guidance pricing.
- (c) Does your business coordinate the selling prices or supply of A4 copy paper with other domestic producers or any Government of Indonesia departments? If yes, provide details.
- (d) Explain whether your business provides information or data to the Government of Indonesia, other government officials or commercial/industry organisations, including those outside of Indonesia, which report on the pulp and paper sector.
- (e) Explain whether your business provides A4 copy paper price data to any other person at the provincial, regional or special economic zone level of government.

<b>Response from the original investigation questionnaire response</b>
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[Detail any further updated response to that provided in the original questionnaire response] [If no change, confirm so]
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<a href="#">See response at commencement of Section H.</a>
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<b>Response for this review</b>
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[Provide your response and/or further information here]
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[If there has been no change to the original questionnaire response, confirm so]
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<a href="#">See response at commencement of Section H.</a>
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3. Industry associations

- (a) Is your business a member of any business associations? If yes, explain your business' relationship with the association and the involvement of the Government of Indonesia with the associations.
- (b) If your business is a member of an industry association, indicate whether this membership is voluntary or compulsory. Explain the functions that the association provides for your business. Explain in detail the role of the association with respect to the directives as provided by the Government of Indonesia concerning the pulp and paper industry.

**Response from the original investigation questionnaire response**

[Detail any further updated response to that provided in the original questionnaire response]  
[If no change, confirm so]

[See response at commencement of Section H.](#)

**Response for this review**

[Provide your response and/or further information here]  
[If there has been no change to the original questionnaire response, confirm so]

[See response at commencement of Section H.](#)

## 4. Other industry associations

- (a) Is your business a member of any other industry associations? If yes, explain your business' relationship with the association and the involvement of the Government of Indonesia with the association.
- (b) If your business is a member of another industry association, indicate whether this membership is voluntary or compulsory. Explain the functions that the association provides for your business. Explain in detail the role of the association with respect to the directives as provided by the Government of Indonesia concerning the pulp and paper industry.

**Response from the original investigation questionnaire response**

[Detail any further updated response to that provided in the original questionnaire response]  
[If no change, confirm so]

[See response at commencement of Section H.](#)

**Response for this review**

[Provide your response and/or further information here]  
[If there has been no change to the original questionnaire response, confirm so]

[See response at commencement of Section H.](#)

## 5. Statistics submission/recording

- (a) Indicate if your business makes submissions to the Central Bureau of Statistics and/or any other government organisation. If yes, explain the purpose of these submissions and the type of information submitted.
- (b) Provide a recent example of a submission that has been made to the Central Bureau of Statistics and/or any other government organisation. For example, monthly data relating to sales, production and costs.
- (c) Do the organisations approve or assess your submission? If yes, provide a detailed explanation.
- (d) Do the organisations provide feedback on your submission? If yes, provide a detailed explanation.

**Response from the original investigation questionnaire response**

[Detail any further updated response to that provided in the original questionnaire response]

<b>Response from the original investigation questionnaire response</b>
[If no change, confirm so]  <a href="#">See response at commencement of Section H.</a>

<b>Response for this review</b>
[Provide your response and/or further information here] [If there has been no change to the original questionnaire response, confirm so]  <a href="#">See response at commencement of Section H.</a>

6. Manufacturing inputs
  - (a) Is there a difference in purchase price for raw materials between your suppliers?
  - (b) If your supplier is based outside Indonesia, what import duty rate is applied on the raw materials?
  - (c) Does your business benefit from any concession on the purchase of any utility services (e.g. electricity, gas, etc.)? If so explain the nature and the amount of the concession?

<b>Response from the original investigation questionnaire response</b>
[Detail any further updated response to that provided in the original questionnaire response] [If no change, confirm so]  <a href="#">See response at commencement of Section H.</a>

<b>Response for this review</b>
[Provide your response and/or further information here] [If there has been no change to the original questionnaire response, confirm so]  <a href="#">See response at commencement of Section H.</a>

7. Regional differences
  - (a) If you have production facilities in more than one region/province, are the laws and regulations in each region the same with respect to pricing? Provide details on any regional differences.

<b>Response from the original investigation questionnaire response</b>
[Detail any further updated response to that provided in the original questionnaire response] [If no change, confirm so]  <a href="#">See response at commencement of Section H.</a>

<b>Response for this review</b>
[Provide your response and/or further information here] [If there has been no change to the original questionnaire response, confirm so]  <a href="#">See response at commencement of Section H.</a>

8. Copy paper production/output during the review period

- (a) Is any part of your production of A4 copy paper subject to **any** national/regional industrial policy or guidance? If yes, provide details including a background of the policy/guidance and explain any restriction imposed by the policy/guidance.
- (b) To what extent are **any** of the policies/guidelines identified in a) applicable to your business?
- (c) Where applicable, how did your business respond to the policies/guidelines?
- (d) Provide details regarding any other restrictions (e.g. geographic/regional, downstream, use, etc.) to the sale of A4 copy paper that **may be imposed** by the Government of Indonesia.
- (e) Provide a list of **all** your domestic customers of the goods, include the location (city and province) of the customer and indicate whether each customer is an SIE.
- (f) Are there **any restrictions and/or conditions** in relation to the quality or quantity of the production of the goods placed upon your business? If yes, provide details.
- (g) Does your business require **an export licence**? If yes, provide details.
- (h) Are the **goods sold by your business** subject to **any export restrictions** and/or limits during the previous **five year**? If yes, provide details.
- (i) Provide details regarding **any other restrictions** (e.g., geographic/regional, downstream, end use) **placed** upon your business on the **sale of the goods**.
- (j) Have there been **any** changes to your production capacity of the goods over the last **five** years? If yes, provide details.

Response from the original investigation questionnaire response
<p>[Detail any further updated response to that provided in the original questionnaire response]                      [If no change, confirm so]</p> <p><a href="#">See response at commencement of Section H.</a></p>

Response for this review
<p>[Provide your response and/or further information here]                      [If there has been no change to the original questionnaire response, confirm so]</p> <p><a href="#">See response at commencement of Section H.</a></p>

9. Sales price during the [original] investigation period [2015]
- (a) Explain whether your business has been subjected to any direct or indirect price guidance or controls by the Government of Indonesia during the [original] investigation period.
  - (b) Explain whether your business has been subjected to any direct or indirect price guidance or controls by the Government of Indonesia during the [original] investigation period, with respect to raw material inputs. N/A
  - (c) Explain whether your business has encountered any price guidance or controls established by regional or special economic zone officials and/or organisations. N/A
  - (d) Describe in detail how the selling price of the goods is determined. In particular, provide details of any restrictions, limitations, or other considerations imposed on your business. The only considerations are commercial considerations.
  - (e) Which organisation/business entity do **you consider** as the price leader of the goods? Do not consider any entity to be a price leader.
  - (f) Does your business have a pricing committee in respect of the goods? If so provide the names and positions of all members of the Committee.
  - (g) How often does the pricing committee meet to discuss selling prices of the goods? Provide the minutes or any other relevant documents of all meetings of the pricing committee during the [original] investigation period.
  - (h) Identify the person who authorises the sales terms, prices and other contract provisions for the sale of the goods by your business.
  - (i) If you have production facilities of the goods in more than one region and/or province, are the laws and regulations in each region the same with respect to pricing of the goods? If not, provide details on the differences.

<b>Response from the original investigation questionnaire response</b>
[Detail any further updated response to that provided in the original questionnaire response] [If no change, confirm so]
<a href="#">See response at commencement of Section H.</a>

<b>Response for this review</b>
[Provide your response and/or further information here] [If there has been no change to the original questionnaire response, confirm so]
<a href="#">See response at commencement of Section H.</a>

10. Adding capacity and/or joint ventures
- (a) Provide a detailed explanation with respect to the government approval process on adding capacity and/or joint ventures in relation to your business.
  - (b) Does the government have the right to request modifications in the terms of adding capacity and/or joint ventures? If yes, provide a detailed explanation.

<b>Response from the original investigation questionnaire response</b>
[Detail any further updated response to that provided in the original questionnaire response] [If no change, confirm so]
<a href="#">See response at commencement of Section H.</a>

<b>Response for this review</b>
[Provide your response and/or further information here] [If there has been no change to the original questionnaire response, confirm so]
<a href="#">See response at commencement of Section H.</a>

11. Raw material purchases
- (a) Provide a detailed listing of your raw material purchases (e.g. logs, pulp, or chemicals) by completing the worksheet named “G-7 Raw material purchases”.
  - (b) Do you have more than one supplier of the raw materials? If yes, provide an explanation of the reasons of price differences between these suppliers?
  - (c) Describe in detail your business’ purchase procedures of the raw materials and the considerations in selecting a supplier. If it is by tenders, provide details of the criterions/conditions.
  - (d) If any of your raw materials for the A4 copy paper are imported by your business, or related businesses:
    - (i) Provide details including a description of the raw material imported, the supplier and country of origin.
    - (ii) Explain the process required to import the raw materials (e.g. obtaining an import licence, import declarations).
    - (iii) Provide details of any conditions to importing the raw materials (e.g. customs and/or quarantine).
    - (iv) Are you eligible for a duty drawback? If yes, provide details.

<b>Response from the original investigation questionnaire response</b>
[Detail any further updated response to that provided in the original questionnaire response] [If no change, confirm so]

**Response from the original investigation questionnaire response**

[See response at commencement of Section H.](#)

**Response for this review**

[Provide your response and/or further information here]  
[If there has been no change to the original questionnaire response, confirm so]

[See response at commencement of Section H.](#)

## H-4 Provision of standing timber for less than competitive market prices

The original investigation assessed whether raw materials, in the form of standing timber, were supplied to producers at a price that is below what would otherwise be in a competitive market. If your company, or a company that is related with your company, harvests standing timber from public land to use as the fibre source for the production of subject merchandise, please answer the below questions.

1. Please provide a description of each type of concession arrangement for public timber harvested during the [original] period of investigation by your company(ies) or cross-owned company(ies). Include in your answer whether the arrangement is long-term (greater than ten years) or short-term.

**Response from the original investigation questionnaire response**

[Detail any further updated response to that provided in the original questionnaire response]  
[If no change, confirm so]

[See response at commencement of Section H.](#)

**Response for this review**

[Provide your response and/or further information here]  
[If there has been no change to the original questionnaire response, confirm so]

[See response at commencement of Section H.](#)

2. Provide copies of the applications, standard contracts, permit or other documents for each type of concession arrangement which specify the terms and conditions of the arrangements.

**Response from the original investigation questionnaire response**

[Detail any further updated response to that provided in the original questionnaire response]  
[If no change, confirm so]

[See response at commencement of Section H.](#)

**Response for this review**

[Provide your response and/or further information here]  
[If there has been no change to the original questionnaire response, confirm so]

[See response at commencement of Section H.](#)

3. Please provide a description of each type of arrangement for private timber harvested during the period of investigation by your company(ies) or cross-owned company(ies). Include in your answer whether the arrangement to harvest private timber is long-term (greater than ten years) or short-term. Indicate whether the private timber that is harvested is owned by your company(ies) or cross-owned company(ies) or is owned by an unaffiliated party. For harvest of timber owned by your company(ies) or cross-owned company(ies), please provide documentation and conditions of ownership. For arrangements involving the harvest of unaffiliated private party timber, provide copies of relevant contracts and other documents for each type of arrangement which specify the terms and conditions of the arrangements.

<b>Response from the original investigation questionnaire response</b>
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[Detail any further updated response to that provided in the original questionnaire response] [If no change, confirm so]
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<a href="#">See response at commencement of Section H.</a>
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<b>Response for this review</b>
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[Provide your response and/or further information here] [If there has been no change to the original questionnaire response, confirm so]
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<a href="#">See response at commencement of Section H.</a>
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4. For each concession arrangement for public timber held by your company or a cross-owned company, and each arrangement to harvest private timber, please provide the following information for the [original] period of investigation:
- a. For each species, the stumpage fee and the total quantity harvested and the value of fees and charges paid to the administering authority or owner. Provide the value in Indonesian rupiah per cubic meter.
  - b. For each species harvested under the concession arrangements, or private arrangements, please provide a breakdown of the volume and the value of fees and charges paid to the administering authority or owner for logs that went to:
    - i. pulp and paper mills; and
    - ii. other uses
    - iii. Provide the value in Indonesian rupiah per cubic meter.

<b>Response from the original investigation questionnaire response</b>
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[Detail any further updated response to that provided in the original questionnaire response] [If no change, confirm so]
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<a href="#">See response at commencement of Section H.</a>
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<b>Response for this review</b>
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[Provide your response and/or further information here] [If there has been no change to the original questionnaire response, confirm so]
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<a href="#">See response at commencement of Section H.</a>
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5. For each concession arrangement held by your company or a cross-owned company, please describe any contingent obligations that the concession-holder must fulfil in order to keep the right to harvest stumpage (e.g., silviculture).



<b>Response from the original investigation questionnaire response</b>
[Detail any further updated response to that provided in the original questionnaire response] [If no change, confirm so]
<a href="#">See response at commencement of Section H.</a>

<b>Response for this review</b>
[Provide your response and/or further information here] [If there has been no change to the original questionnaire response, confirm so]
<a href="#">See response at commencement of Section H.</a>

6. For each concession arrangement, document and calculate any additional costs that the contingent obligations entail in terms of rupiah per cubic meter of logs harvested.

<b>Response from the original investigation questionnaire response</b>
[Detail any further updated response to that provided in the original questionnaire response] [If no change, confirm so]
<a href="#">See response at commencement of Section H.</a>

<b>Response for this review</b>
[Provide your response and/or further information here] [If there has been no change to the original questionnaire response, confirm so]
<a href="#">See response at commencement of Section H.</a>

## H-5 Government Prohibition of Log Exports

The original investigation assessed whether the domestic price of raw materials, in the form of logs, is artificially low due to a ban on the export of logs by the Government of Indonesia.

1. Provide the volume and value of all logs that your company and companies that are crossed-owned with your company purchased from unaffiliated parties during the [original] investigation period. Report the following information for purchases of domestic logs and imported logs separately.
  - a. Volume (cubic meters) and value of log purchases.
  - b. Weighted-average purchase price (f.o.b. mill) by species, grade and quality.
  - c. All costs (rupiah/cubic meter) borne by the seller, including administrative, transportation, warehousing, and other selling expenses.

<b>Response from the original investigation questionnaire response</b>
[Detail any further updated response to that provided in the original questionnaire response] [If no change, confirm so]
<a href="#">See response at commencement of Section H.</a>

<b>Response for this review</b>
[Provide your response and/or further information here]

<b>Response for this review</b>
[If there has been no change to the original questionnaire response, confirm so]
<a href="#">See response at commencement of Section H.</a>

- Describe whether the quality of any imported logs purchased by your company or a cross-owned companies differs from that of logs purchased domestically.

<b>Response from the original investigation questionnaire response</b>
[Detail any further updated response to that provided in the original questionnaire response] [If no change, confirm so]
<a href="#">See response at commencement of Section H.</a>

<b>Response for this review</b>
[Provide your response and/or further information here] [If there has been no change to the original questionnaire response, confirm so]
<a href="#">See response at commencement of Section H.</a>

- Of all the logs you have reported above as purchased from unaffiliated parties, please indicate the volume and value of those logs used in the production of uncoated paper.

<b>Response from the original investigation questionnaire response</b>
[Detail any further updated response to that provided in the original questionnaire response] [If no change, confirm so]
<a href="#">See response at commencement of Section H.</a>

<b>Response for this review</b>
[Provide your response and/or further information here] [If there has been no change to the original questionnaire response, confirm so]
<a href="#">See response at commencement of Section H.</a>

- Provide the names and addresses of the unaffiliated companies that supply the domestic logs that your company or cross-owned companies purchased.

<b>Response from the original investigation questionnaire response</b>
[Detail any further updated response to that provided in the original questionnaire response] [If no change, confirm so]
<a href="#">See response at commencement of Section H.</a>

<b>Response for this review</b>
[Provide your response and/or further information here] [If there has been no change to the original questionnaire response, confirm so]
<a href="#">See response at commencement of Section H.</a>

- Are these unaffiliated log suppliers subject to Indonesian log export restrictions? If so, identify the restrictions and indicate how these export restrictions influence your log price negotiations with

these unaffiliated suppliers. Please provide documentation that shows your firm’s per-metric ton freight expenses for transporting the type of goods in question from the nearest seaport to your firm’s factory complexes during the period of investigation. If your firm did not incur these expenses, please provide the same information for shipping a closely-related input product or finished product to or from the nearest seaport during the period of investigation.

Response from the original investigation questionnaire response
<p>[Detail any further updated response to that provided in the original questionnaire response]                      [If no change, confirm so]</p> <p><a href="#">See response at commencement of Section H.</a></p>

Response for this review
<p>[Provide your response and/or further information here]                      [If there has been no change to the original questionnaire response, confirm so]</p> <p><a href="#">See response at commencement of Section H.</a></p>

**H-6 Market Situation Findings in Investigation 341**

1. *Anti-Dumping Commission Report No. 341* made findings in relation to the market situation that existed in the Indonesian A4 copy paper market during the original investigation period [2015]. Please provide:
  - a. any further information you may wish to submit in relation to these findings relating to the original investigation period; and/or
  - b. any further information you may wish to submit in relation to these findings as to how they would apply to the review period.

Response for this review
<p>[Provide your response and/or further information here]</p> <p><a href="#">See response at commencement of Section H.</a></p>

## SECTION I MARKET SITUATION & PROPER COMPARISON

### Overriding Comment for this Section:

What is the relevance of a finding of a 'particular market situation' in the original investigation to the current review? What factor or circumstance was identified in the original investigation resulting in the finding of a 'particular market situation' that precluded a 'proper comparison' of domestic and export prices and why? The findings of the WTO Panel in 'Australia – A4 Copy Paper' are relevant in this regard.

Further, why must the Commissioner examine the issue of 'particular market situation' in this review because of his findings of a 'particular market situation' in the original investigation? What is the statutory authority for this? Also, what is the statutory authority for the Commissioner to ignore the basis on which Australian Paper in its application claimed that APRIL's variable factors had changed since the original investigation based on its actual domestic and export prices of A4 Copy Paper?

What other aspects of Australian Paper's application does the Commissioner intend to ignore or unilaterally vary? What is the purpose of an application for review if not to define the scope and parameters of the review set out in the application?

#### **Instructions**

This section provides an opportunity for your company to respond specifically to the questions in the context of this review.

In responding to the questions in this section please respond to these questions in relation to the review period (1 January 2019 to 31 December 2019).

Section 269TAC(1) of the *Customs Act 1901* (Cth) (the Act) provides that, subject to this section, the normal value of any goods exported to Australia is the price paid or payable for like goods sold in the ordinary course of trade for home consumption in the country of export in sales that are arms length transactions by the exporter or, if like goods are not so sold by the exporter, by other sellers of like goods.

In addition, section 269TAC(2)(a)(ii) of the Act provides that, subject to this section, where the Minister is satisfied that because of the situation in the market of the country of export is such that sales in that market are not suitable for use in determining a price under subsection (1), the normal value of the goods exported to Australia cannot be ascertained under subsection (1).

### **I-1 Market situation**

In the original investigation, the Commissioner made findings in relation to a situation in the market (market situation) affecting the Indonesian exporters' domestic prices of A4 copy paper. Following the Commissioner's recommendation, the then Parliamentary Secretary<sup>4</sup> accepted, among other things that:

- programs and policies of the Government of Indonesia and the export ban on logs increased the supply of logs in Indonesia and thereby lowered the cost and price of logs and hardwood pulp;<sup>5</sup>
- the lowered cost and price of logs and hardwood pulp in Indonesia induced and allowed Indonesian A4 copy paper producers (also integrated A4 copy paper producers with their own

<sup>4</sup> Parliamentary Secretary to the Minister for Industry, Innovation and Science and the Assistant Minister for Industry, Innovation and Science, to the Minister for Industry, Innovation and Science.

<sup>5</sup> Report 341, Appendix 2, p. 166, 168, 170, 172, 183.

upstream pulp facilities)<sup>6</sup> to supply more A4 copy paper at each possible price point than they otherwise would have; and

- the resultant price of A4 copy paper in Indonesia was artificially low, significantly below regional benchmarks and reflected the lowered cost and price of logs and hardwood pulp in Indonesia that resulted from the programs and policies of the Government of Indonesia.<sup>7</sup>

For a full description of the Commissioner's findings, please refer to Appendix 2 of *Anti-Dumping Commission Report No. 341* (REP 341).

As part of its Review, the Commission will consider if a market situation exists in the Indonesian A4 copy paper market during the review period.

1. Provide any information, including any evidence, you may wish to submit in relation to whether this market situation has changed during the review period.

Response for this review
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

## I-2 Proper comparison

If the Minister is satisfied a market situation exists during the review period, the Minister must consider whether, because of that market situation, Indonesian exporters' domestic sales of A4 copy paper are suitable for determining a price under section 269TAC(1) of the Act.

In the event that a market situation is found, the Commissioner, in his recommendation to the Minister, intends to consider the suitability of Indonesian domestic sales by determining whether, because of the market situation, Indonesian exporters' domestic sales price permit a proper comparison with their export price by assessing the following:

- the effect of the market situation on the exporter's domestic price in Indonesia;
- the effect of the market situation on the exporter's export price; and
- whether the effect of the market situation is such that the exporter's domestic price and export price cannot be properly compared.

In accordance with the World Trade Organization (WTO) Panel Report, the Commissioner's assessment will include, but is not limited to, consideration of the following comments made by the WTO Panel:

1. "[a] purely numerical comparison between the [domestic and export] prices may not reveal anything about whether the domestic price can be properly compared with the export price."<sup>8</sup>
2. "The phrase "because of the particular market situation" makes clear that the qualitative assessment of whether the domestic and export prices can be properly compared should focus on how the particular market situation affects that comparison."<sup>9</sup>
3. "[t]he investigating authority must examine the domestic sales in order to determine whether a proper comparison between the two prices is permitted in spite of the effect of the particular market situation."<sup>10</sup>
4. "[w]hile a particular market situation may have an effect on both domestic and export prices, it does not follow that the impact on domestic and export prices will be the same."<sup>11</sup>
5. "[h]ow domestic prices and export prices of an individual exporter are affected notwithstanding an equal decrease in input costs is likely to depend significantly upon a

<sup>6</sup> Report 341, Appendix 2, p. 167, 168, 173 (footnote omitted), 174.

<sup>7</sup> Report 341, Appendix 2, p. 153, 167, 173-174.

<sup>8</sup> Panel Report, *Australia – Anti-Dumping Measures on A4 Copy Paper*, para. 7.75.

<sup>9</sup> Panel Report, *Australia – Anti-Dumping Measures on A4 Copy Paper*, para. 7.75.

<sup>10</sup> Panel Report, *Australia – Anti-Dumping Measures on A4 Copy Paper*, para. 7.76.

<sup>11</sup> Panel Report, *Australia – Anti-Dumping Measures on A4 Copy Paper*, para. 7.76.

number of factors, including the prevailing conditions of competition in each market and the existing relationship between price and cost. We consider that an exporter may find itself with different options in respect of how to take advantage of an input cost decrease depending on market conditions in each market.”<sup>12</sup>

- “[w]hether the exporter's domestic sales permit a proper price comparison with the export price is a question that can only be ascertained through an examination of relevant factual circumstances.”<sup>13</sup>

6. **In the event that** the Minister is satisfied this market situation is found to exist during the review period, please comment and provide any relevant evidence on:
  - (a) the effect of the market situation on your business’ domestic price in Indonesia;
  - (b) the effect of the market situation on your business’ export price;
  - (c) whether the effect of the market situation is such that your business’ domestic price and export price cannot be properly compared.

Response for this review
<p>[Provide your response and/or further information here]</p> <p><a href="#">See responses at commencement of Section H.</a></p> <p><a href="#">Calls for a speculative response. Not a response based on fact supported by evidence. Not relevant to this review.</a></p>

7. **In the event that** the Minister is satisfied this market situation is found to exist during the review period, please comment and provide any relevant evidence on the effect of the market situation on the exports of goods by any other related entities to Australia.

Response for this review
<p>[Provide your response and/or further information here]</p> <p><a href="#">See responses at commencement of Section H.</a></p> <p><a href="#">As above.</a></p>

8. Please provide any further information and evidence you may wish to submit.

Response for this review
<p>[Provide your response and/or further information here]</p> <p><a href="#">See responses at commencement of Section H.</a></p>

<sup>12</sup> Panel Report, *Australia – Anti-Dumping Measures on A4 Copy Paper*, para. 7.80.

<sup>13</sup> Panel Report, *Australia – Anti-Dumping Measures on A4 Copy Paper*, para. 7.81.

## SECTION J

### PROPER COMPARISON – INDONESIAN A4 COPY PAPER MARKET

#### Overriding Comments for this Section:

The questions in this Section are misconceived, irrelevant to this review and unduly intrusive. Internal decision-making processes of an exporter are irrelevant to the issue of 'proper comparison'. As found by the WTO Panel in 'Australia – A4 Copy Paper', an examination by an investigating authority, such as the Commissioner, must be into 'markets' for the sale of the goods in question, here, A4 Copy Paper, and that examination must be in relation to both domestic and export markets.

Relevant are the conditions prevailing in such markets (e.g. are sales and, consequently, prices along with quantities, grades, etc. of the goods being bought and sold in the market and other terms and conditions in such sales negotiated between buyers and sellers at arm's length on a commercial basis) in competition with other suppliers to that market. Internal decision-making processes are irrelevant. Rather, it is the actual decisions made by buyers and sellers in those markets that is relevant. Do those decisions reflect competitive market decisions between a buyer and seller? How those competitive market decisions were reached internally by a participant in the market is irrelevant.

Further, in addressing the issue of whether a 'proper comparison' is precluded the examination must identify whether there is a factor or other circumstance operating in the domestic market that renders sales in that market unsuitable for deriving a normal value for an exporter for 'comparison' with that exporters export prices having regard to both domestic and export markets. The identification of such a factor or circumstances must be why that factor or circumstance renders such sales unsuitable for these purposes and how they affect individual exporter's sales to render them 'unsuitable'.

Again, in considering the issue of 'proper comparison' between domestic and export prices the focus must be on the decisions made in the domestic and export markets between buyers and sellers and the conditions operating in those markets and not internal decision-making processes between buyers and sellers, which processes are not transparent to other participants in the market including competitors.

**Note:** words highlighted in red indicate the lack of precision, clarity and open-ended nature of the question.

#### **Instructions**

This section provides an opportunity for your company to respond specifically to the questions in the context of this review.

In responding to the questions in this section please respond to these questions in relation to the review period (1 January 2019 to 31 December 2019).

### **J-1 Prevailing conditions of competition in the Indonesian market**

1. Describe the Indonesian market for A4 copy paper and the prevailing conditions of competition within the market, including:
  - a. Provide an overall description of the A4 copy paper market in Indonesia which explains its main characteristics and trends over the past five years;
  - b. Provide the sources of demand for A4 copy paper in Indonesia, including the categories of customers, users or consumers of the product;
  - c. Provide the proportion (%) of sales revenue from each of those sources of demand listed in (b);
  - d. Describe the factors that influence consumption/demand variability in Indonesia, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production;

- e. Describe any market segmentations in Indonesia; such as geographic or product segmentations;
- f. Provide the proportion of sales revenue from each of the market segments listed in (e);
- g. Describe the way in which Indonesian and imported A4 copy paper compete in the Indonesian market;
- h. Describe the ways that A4 copy paper are marketed and distributed in the Indonesian market; and
- i. Describe **any other factors that are relevant to characteristics or influences** on the A4 copy paper market in Indonesia.

*Provide documentary evidence to support the responses made to questions 1(a) to (i).*

Response for this review
<p>[Provide your response and/or further information here]</p> <p><a href="#">See the response to Section D – ‘Domestic Sales’.</a></p>

- 2. Provide a diagram which describes the Indonesian market structure for A4 copy paper, ensuring that all the categories of participants are included. In this diagram use linkages to illustrate the different levels of trade and distribution channels within the Indonesian market.

Response for this review
<p>[Provide your response and/or further information here]</p> <p><a href="#">See responses at commencement of Section H.</a></p>

- 3. Describe the **commercially significant market participants** in the Indonesian market for A4 copy paper at each level of trade over the review period. Include in your description:
  - 1. names of the participants;
  - 2. the level of trade for each market participant (e.g., manufacturer, reseller, original equipment manufacturer (EOM), retailer, corporate stationer, importer, etc.);
  - 3. a description of the degree of integration (either vertical or horizontal) for each market participant; and
  - 4. an estimation of the market share of each participant.

Response for this review
<p>[Provide your response and/or further information here]</p> <p><a href="#">What is meant by “commercially significant market participants” in the Indonesian market for A4 copy? Please clarify.</a></p>

- 4. Identify the names of commercially significant importers in the Indonesian market for A4 copy paper over the review period and estimate their market share. Specify the country each importer imports from and their level of trade in the Indonesian market, if known.

Response for this review
<p>[Provide your response and/or further information here]</p> <p><a href="#">See responses at commencement of Section H.</a></p>

- 5. Describe the regulatory framework of the Indonesian market for A4 copy paper as it relates to competition policy, taxation, product standards and the range of the goods. Provide a copy of any regulation described, if available.



**Response for this review**

[Provide your response and/or further information here]

See any "Doing business in Indonesia" guides such as those published by global accounting firms. See also publications such as fact sheets published by Department of Foreign Affairs and Trade and by Austrade. See WTO trade policy review for Indonesia – available on WTO website.

6. Describe any entry restrictions for new participants into the Indonesian market for A4 copy paper. Your response could include information on:
5. resource ownership;
  6. patents and copyrights;
  7. licenses;
  8. barriers to entry;
  9. import restrictions; and
  10. government regulations (including the effect of those government regulations).

*In responding to question 6 ensure that relevant regulations are referenced.*

**Response for this review**

[Provide your response and/or further information here]

See responses at commencement of Section H.

**J-2 A4 copy paper products in the Indonesian market**

1. **Generally** describe the range of A4 copy paper products offered for sale in the Indonesian market. The description should include all goods under consideration including those produced by your company. Your description could include information about:
11. quality differences;
  12. price differences;
  13. supply/availability differences;
  14. technical support differences;
  15. the prevalence of private labels/customer brands;
  16. the prevalence of generic or plain labels;
  17. the prevalence of premium labels; and
  18. product segmentation.

**Response for this review**

[Provide your response and/or further information here]

See response to Section C-2.

2. Describe the end uses of A4 copy paper in the Indonesian market from all sources.

**Response for this review**

[Provide your response and/or further information here]

Same end-uses as A4 Copy Paper has in Australia.

- Describe the **key product attributes** that influence purchasing decisions or purchaser preferences in the Indonesian market. Rank these preferences or purchasing influencers in order of importance.

Response for this review
<p>[Provide your response and/or further information here]</p> <p>This question requires a respondent to speculate on what influences a purchaser in making a decision to purchase, which involves the purchaser's internal decision-making processes that would not be transparent to the seller and, obviously, would vary from time-to-time and between purchasers.</p> <p>APRIL is not a "purchaser" of its products. Consequently, it does not know as a question of fact what influences a purchaser to purchase its products. Just as any other seller in the market, it can only speculate what influences a purchaser in making a decision to purchase.</p>

- Identify if there are **any commercially significant** market substitutes in the Indonesian market for A4 copy paper.

Response for this review
<p>[Provide your response and/or further information here]</p> <p>No, and what constitutes a product a 'substitute'? What is meant by 'commercially significant'? What are the 'criteria' to determining whether a 'substitute', assuming that 'substitutes' exist, is 'commercially significant'? Please clarify.</p>

- Identify if there are **any commercially significant** market **complements** in the Indonesian market for A4 copy paper.

Response for this review
<p>[Provide your response and/or further information here]</p> <p>N/A. Also, see above, and what is meant by 'commercially significant market complements'? What constitutes 'market complements'? What are the criteria for determining whether 'market complements', if any exists, are 'commercially significant'? Please clarify.</p>

- Have there been **any changes** in **market or consumer preferences** in the Indonesian market for A4 copy paper in the last **five years**? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response.

Response for this review
<p>[Provide your response and/or further information here]</p> <p>Obviously, the market and consumer preferences are continually changing. What is the relevance of this to ADC Review No. 551 of the variable factors applying to APRIL's exports? This question requires a speculative response as APRIL is not privy to internal processes of a purchaser governing its preferences. Please clarify.</p>

### J-3 Relationship between price and cost in Indonesia

1. Describe the importance of the Indonesian market to your company's operations. In your response describe:
  - a. The proportion of your company's sales revenue derived from sales of A4 copy paper in Indonesia; and
  - b. The proportion of your company's profit derived from sales of A4 copy paper in Indonesia.

*In responding to question 1 please provide evidence supporting calculations.*

Response for this review
<p>[Provide your response and/or further information here]</p> <p>See responses to Sections B &amp; D.</p>

2. Is your organisation/business the **price leader** of A4 copy paper in the **Indonesian market**? If no, please explain the reasons behind your response and specify the name(s) of the price leaders.

Response for this review
<p>[Provide your response and/or further information here]</p> <p>What is a 'price leader'? What are the 'criteria' for determining a 'price leader'? Question requires a speculative response as each participant in the market may have a different opinion as to which entity is the 'price leader'. What is the relevance of this question to the review (i.e. changes to variable factors)? Please clarify.</p>

3. Describe the **nature** of your product pricing (e.g., market penetration, inventory clearance, product positioning, price taker, price maker, etc.) and your price strategies (e.g., competition-based pricing, cost-plus pricing, dynamic pricing, price skimming, value pricing, penetration pricing, bundle pricing, etc.) in Indonesia. If there are multiple strategies applied, please rank these by importance. If there are different strategies for different products, please specify these. Provide copies of internal documents which support the nature of your product pricing.

Response for this review
<p>[Provide your response and/or further information here]</p> <p>See responses at the commencement of Section H.</p> <p>Also, APRIL's strategy in relation to the sale of A4 Copy Paper in its domestic and export markets is to be competitive in these markets. Strategies in these markets constantly change as conditions in these markets continually change in accordance with the competitive market conditions in those markets. Please clarify relevance.</p>

4. Explain the process for how the selling prices of A4 copy paper for the Indonesian market by your business are determined. Provide copies of internal documents which support how pricing is determined.

Response for this review
<p>[Provide your response and/or further information here]</p> <p>See response to the previous question.</p>

**Response for this review**

Prices at which A4 Copy Paper is sold by APRIL in its domestic and export markets are determined by the competitive market conditions and are agreed in commercial negotiations with customers, who are unrelated to APRIL, on commercial terms and conditions and in competition with other suppliers to those markets.

5. How frequently are your Indonesian selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review. Provide the names and positions of all persons involved.

**Response for this review**

[Provide your response and/or further information here]

See response to the previous question.

Please clarify how frequency is relevant for the review of the variable factors during the review period.

6. Rank the following factors in terms of their influence on your pricing decisions in the Indonesian market, with the most important factor ranked first and the least important factor ranked last:
19. Competitors' prices
  20. Purchase price of raw materials
  21. Cost to make and sell the goods
  22. Level of inventory
  23. Value of the order
  24. Volume of the order
  25. Value of forward orders
  26. Volume of forward orders
  27. Customer relationship management
  28. Supplier relationship management
  29. Desired profit
  30. Brand attributes
  31. Other [please define what this factor is in your response]

**Response for this review**

[Provide your response and/or further information here]

See the response to previous questions and the overall responses set out at the commencement of Section H.

They are all of equal ranking as they will vary over time according to each customer, market conditions, etc. It is in the nature of supplying a product to a competitive market subject to the usual market conditions that these factors are constantly changing.

7. Describe the relationship between selling price and costs to make and sell in the Indonesian market. Does your company maintain a desired profit margin for A4 copy paper?

**Response for this review**

[Provide your response and/or further information here]

Objective is to recover the cost of production in the price of A4 Copy Paper. There is no fixed profit in negotiating prices with customers. There is no fixed, direct relationship. It may vary from time-to-

**Response for this review**

time. Prices are agreed and subject to market conditions in the usual way – i.e. by arm's length negotiations between buyers and sellers in a market subject to competitive conditions.

8. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the Indonesian market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.

**Response for this review**

[Provide your response and/or further information here]

See responses to Sections of this Exporter Questionnaire (Indonesia) dealing with domestic sales and export sales.

9. Do you offer bundled pricing in the Indonesian market? If yes, explain how the pricing for bundled A4 copy paper is determined. Explain how the costs to make and sell are considered in establishing these bundled prices for A4 copy paper. Provide copies of internal documents which support your claims in response to this question.

**Response for this review**

[Provide your response and/or further information here]

As above.

10. Does the volume of sales to a customer or the size of an order influence your selling price in Indonesia? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume based prices for A4 copy paper. Provide copies of internal documents which support your claims in response to this question.

**Response for this review**

[Provide your response and/or further information here]

As above.

11. Does your organisation/business use **sales contracts** in the **Indonesian market**? If yes:
1. What proportion of your sales revenue would come from contracted sales versus uncontracted sales?
  2. Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?
  3. How frequently are sales contracts renegotiated?
  4. How frequently are price reviews conducted between contracts?
  5. Do you provide opportunities for price reviews for customers within contracts? If yes, provide a description of the process and an explanation of the circumstances that might lead to a price review.
  6. Do changes in your costs to make and sell enable you to review prices for customers within contracts?
  7. Provide a list of the customers under contract during the review period and copies of the two largest contracts in terms of sales revenue. Provide a complete translation of the documents.

**Response for this review**

[Provide your response and/or further information here]

Sales of a product for a purchase price legally involves a contract of sale. No different to the position in Australia – see State and Territory sale of goods legislation.

12. Provide copies of any price lists for A4 copy paper used in the Indonesian market during the review period. If you do not use price lists, describe the **transparency** of your prices in the Indonesian market.

**Response for this review**

[Provide your response and/or further information here]

Please clarify this question. What is meant by 'transparency', of what 'prices' and to whom? As with any other product sold in a competitive market, prices vary from customer-to-customer and over time. Please clarify the relevance of this question.

13. How do you differentiate pricing for different A4 copy paper products in the Indonesian market? Describe how your products are grouped for price differentiation and the methodology used. Describe any cost to make or selling cost differences between differentiated products. Describe how these cost differences (if any) influence pricing decisions. Provide copies of internal documents which support your claims in response to this question.

**Response for this review**

[Provide your response and/or further information here]

Pricing in a competitive market is governed by the conditions of supply and demand and other competitive conditions prevailing in the market, which vary according to locality, time, customer, etc. Please explain the relevance of this question.

14. Do you tier or segment your Indonesian A4 copy paper customers in terms of pricing? If yes, provide:
- a general description of how this is done;
  - list the factors that influence pricing differentiation in different tiers or segments; and
  - explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.

*Provide copies of internal documents which support your claims in response to this question.*

**Response for this review**

[Provide your response and/or further information here]

N/A

15. Do you sell A4 copy paper to related entities in Indonesian? If yes, describe how prices are set for related party transactions and specify what proportion of your sales in terms of sales revenue are to related party entities. If available, provide a copy of any internal document relevant to establishing pricing to related parties.

Response for this review
<p>[Provide your response and/or further information here]</p> <p>No – see response to earlier Sections on domestic and export sales.</p>

**J-4 Marketing and sales support in the Indonesian market**

- How does your company market A4 copy paper in the Indonesian market? Include in your response the value proposition used (e.g. price, quality, reliability, availability, etc.).

Response for this review
<p>[Provide your response and/or further information here]</p> <p>See responses to earlier Sections on domestic and export sales</p>

- Does your company conduct brand segmentation in the Indonesian market for A4 copy paper? If yes, describe the brand segmentation used and provide the proportion of sales revenue derived from each brand segment.

Response for this review
<p>[Provide your response and/or further information here]</p> <p>Why is only the “Indonesian market” relevant for this question? What is the significance/relevance of ‘brand segmentation’? Please clarify.</p>

- Provide examples of your Indonesian advertising of A4 copy paper over the past five years. If you have not used advertising in Indonesian, provide examples of any other A4 copy paper promotion campaigns you have conducted over the review period.

Response for this review
<p>[Provide your response and/or further information here]</p> <p>It is not possible to provide copies of advertising over the past 5 years for all markets in which A4 Copy Paper is sold by APRIL. Also please clarify relevance to this review.</p>

- How many people are in your Indonesian sales team and where are they located? In general terms, how are they remunerated? If they are offered performance pay based on sales, describe the performance indicators used to establish the performance pay. Provide copies of internal documents which support your claims in response to this question.

Response for this review
<p>[Provide your response and/or further information here]</p> <p>What is the relevance of his question in confining it to “Indonesian sales team” and what is meant by “Indonesian sales team (i.e. personnel in sales team(s) located in Indonesia and/or sales personnel responsible for sales in Indonesia)? Please clarify. Also, please clarify how this is relevant to the review.</p>

6. Describe what **parameters** are provided to sales staff to assist in establishing pricing for A4 copy paper when negotiating sales with customers. Provide copies of internal documents which support your claims in response to this question.

**Response for this review**

[Provide your response and/or further information here]

Please clarify what is meant by “parameters” and their relevance to this review.



## SECTION K

### PROPER COMPARISON – PRODUCTION COSTS

For production costs of A4 Copy Paper for sale in domestic and export markets, please see response to Section G (Cost to Make and Sell).

#### **Instructions**

This section provides an opportunity for your company to respond specifically to the questions in the context of this review.

In responding to the questions in this section, please respond to these questions only in relation to the review period (1 January 2019 to 31 December 2019).

#### **K-1 Production of A4 copy paper**

1. Describe how your company determines its volume of production for A4 copy paper, product mix of production and the factors that contribute to these decisions. How frequently are production volumes determined for A4 copy paper? How frequently is the product mix determined for A4 copy paper? Provide copies of internal documents which support your claims in response to this question.

#### **Response for this review**

[Provide your response and/or further information here]

[See responses at commencement of Section H.](#)

2. What lead times are typically needed to adjust volumes of production for A4 copy paper? Provide copies of internal documents which support your claims in response to this question.

#### **Response for this review**

[Provide your response and/or further information here]

[See responses at commencement of Section H.](#)

3. Do you have warehousing facilities for A4 copy paper? If no, what do you do with excess inventory? If yes:
  - (a) What is the volume capacity of these facilities?
  - (b) What was the monthly volume of inventory maintained during the review period?
  - (c) What is the average period of time that inventory is retained (describe how this is calculated)?

*Provide copies of internal documents which support your claims in response to this question.*

#### **Response for this review**

[Provide your response and/or further information here]

[See responses at commencement of Section H.](#)

4. Have there been any changes to the type of capital or technology utilised by your company in the manufacturing of A4 copy paper in the last five years? If yes, provide details.

**Response for this review**

[Provide your response and/or further information here]

[See responses at commencement of Section H.](#)

5. For each paper plant capable of producing paper that could be utilised to make A4 copy paper, provide the date that production facility came into operation and the production capacity of the plant over the past five years. The production capacity should be based on an actual production capacity, not a budgeted production capacity. Provide copies of internal documents which support your claims in response to this question.

**Response for this review**

[Provide your response and/or further information here]

[See responses at commencement of Section H.](#)

6. List any significant investments in the past five years to either upgrade, refurbish or build any of the following types of plants:
- (a) wood chipping;
  - (b) pulp production;
  - (c) paper manufacturing; and
  - (d) paper cutting or rolling facilities.

*Provide copies of internal documents which support your claims in response to this question.*

**Response for this review**

[Provide your response and/or further information here]

[See responses at commencement of Section H.](#)

7. Confirm whether management reports are prepared on production costs. If yes:
- (a) specify how often these cost reports are prepared;
  - (b) describe the level of detail in those reports and whether they enable the establishment of costs of producing A4 copy paper;
  - (c) specify to whom within the company these reports are provided; and
  - (d) provide copies of these reports for each month of the review period.

**Response for this review**

[Provide your response and/or further information here]

[See responses at commencement of Section H.](#)

## SECTION L

### PROPER COMPARISON – AUSTRALIAN A4 COPY PAPER MARKET

#### **Instructions**

This section provides an opportunity for your company to respond specifically to the questions in the context of this review.

In responding to the questions in this section, please respond to these questions in relation to the review period (1 January 2019 to 31 December 2019).

#### **L-1 Prevailing conditions of competition in the Australian market**

1. Describe the Australian market for A4 copy paper and the prevailing conditions of competition within the market, including:
  - a. Provide an overall description of the A4 copy paper market in Australia which explains its main characteristics and trends over the past five years;
  - b. Provide the sources of demand for A4 copy paper in Australia, including the categories of customers, users or consumers of the product;
  - c. Provide the proportion (%) of sales revenue from each of those sources of demand listed in (b);
  - d. Describe the factors that influence consumption/demand variability in Australia, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production;
  - e. Describe any market segmentations in Australia, such as geographic or product segmentations;
  - f. Provide the proportion of sales revenue from each of the market segments listed in (e);
  - g. Describe the way in which Australian manufactured, Indonesian and other imported A4 copy paper compete in the Australian market;
  - h. Describe the ways that A4 copy paper are marketed and distributed in the Australian market; and
  - i. Describe any other factors that are relevant to characteristics or influences on the A4 copy paper market in Australia.

*Provide documentary evidence to support the responses made to questions 1(a) to (i).*

#### **Response for this review**

[Provide your response and/or further information here]

[See responses at commencement of Section H.](#)

2. Provide a diagram which describes the Australian market structure for A4 copy paper, ensuring that all the categories of participants are included. In this diagram use linkages to illustrate the different levels of trade and distribution channels within the Australian market.

#### **Response for this review**

[Provide your response and/or further information here]

[See responses at commencement of Section H.](#)

3. Describe the commercially significant market participants in the Australian market for A4 copy paper at each level of trade over the review period. Include in your description:
- names of the participants;
  - the level of trade for each market participant (e.g. manufacturer, reseller, EOM, retailer, corporate stationer, importer, etc.);
  - a description of the degree of integration (either vertical or horizontal) for each market participant; and
  - an estimation of the market share of each participant.

Response for this review
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

4. Identify the names of commercially significant importers in the Australian market for A4 copy paper over the review period and estimate their market share. Specify the country each importer imports from and their level of trade in the Australian market, if known.

Response for this review
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

5. Describe the regulatory framework of the Australian market for A4 copy paper as it relates to competition policy, taxation, product standards and the range of the goods. Provide a copy of any regulation described, if available.

Response for this review
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

6. Describe any entry restrictions for new participants into the Australian market for A4 copy paper. Your response could include information on:
- resource ownership;
  - patents and copyrights;
  - licenses;
  - barriers to entry;
  - import restrictions; and
  - government regulations (including the effect of those government regulations).

*In responding to question 6 ensure that relevant regulations are referenced.*

Response for this review
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

## L-2 Copy paper products in the Australian market

1. Generally describe the range of A4 copy paper products offered for sale in the Australian market. The description should include all goods under consideration including those produced by your company. Your description could include information about:
- quality differences;

- price differences;
- supply/availability differences;
- technical support differences;
- the prevalence of private labels/customer brands;
- the prevalence of generic or plain labels;
- the prevalence of premium labels; and
- product segmentation.

<b>Response for this review</b>
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

2. Describe the end uses of A4 copy paper in the Australian market from all sources.

<b>Response for this review</b>
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

3. Describe the key product attributes that influence purchasing decisions or purchaser preferences in the Australian market. Rank these preferences or purchasing influencers in order of importance.

<b>Response for this review</b>
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

4. Identify if there are any commercially significant market substitutes in the Australian market for A4 copy paper.

<b>Response for this review</b>
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

5. Identify if there are any commercially significant market complements in the Australian market for A4 copy paper.

<b>Response for this review</b>
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

6. Have there been any changes in market or consumer preferences in the Australian market for A4 copy paper in the last five years? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response.

<b>Response for this review</b>
[Provide your response and/or further information here]

<b>Response for this review</b>
<a href="#">See responses at commencement of Section H.</a>

### L-3 Relationship between price and cost in Australia

- Describe the importance of the Australian market to your company's operations. In your response describe:
  - The proportion of your company's sales revenue derived from sales of A4 copy paper in Australia; and
  - The proportion of your company's profit derived from sales of A4 copy paper in Australia.

*In responding to question 1 please provide evidence supporting calculations.*

<b>Response for this review</b>
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

- Is your organisation/business entity the price leader of A4 copy paper in the Australian market? If no, please explain the reasons behind your response and specify the name(s) of the price leaders.

<b>Response for this review</b>
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

- Describe the nature of your product pricing (e.g. market penetration, inventory clearance, product positioning, price taker, price maker, etc.) and your price strategies (e.g. competition-based pricing, cost-plus pricing, dynamic pricing, price skimming, value pricing, penetration pricing, bundle pricing, etc.) in Australia. If there are multiple strategies applied, please rank these by importance. If there are different strategies for different products, please specify these. Provide copies of internal documents which support the nature of your product pricing.

<b>Response for this review</b>
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

- Explain the process for how the selling prices of A4 copy paper for the Australian market by your business are determined. Provide copies of internal documents which support how pricing is determined.

<b>Response for this review</b>
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

- How frequently are your Australian selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review. Provide the names and positions of all persons involved.

Response for this review
[Provide your response and/or further information here]
See responses at commencement of Section H.

6. Rank the following factors in terms of their influence on your pricing decisions in the Australian market, with the most important factor ranked first and the least important factor ranked last:
32. Competitors' prices
  33. Purchase price of raw materials
  34. Cost to make and sell the goods
  35. Level of inventory
  36. Value of the order
  37. Volume of the order
  38. Value of forward orders
  39. Volume of forward orders
  40. Customer relationship management
  41. Supplier relationship management
  42. Desired profit
  43. Brand attributes
  44. Other [please define what this factor is in your response]

Response for this review
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

7. Describe the relationship between selling price and costs to make and sell in the Australian market. Does your company maintain a desired profit margin for A4 copy paper? If not, does your company seek to maintain a desired profit margin for A4 copy paper? Provide copies of internal documents which support your response to this question.

Response for this review
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

8. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the Australian market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.

Response for this review
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

9. Do you offer bundled pricing in the Australian market? If yes, explain how the pricing for bundled A4 copy paper is determined. Explain how the costs to make and sell are considered in establishing these bundled prices for A4 copy paper. Provide copies of internal documents which support your claims in response to this question.

Response for this review
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

10. Does the volume of sales to a customer or the size of an order influence the selling price? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume based prices for A4 copy paper. Provide copies of internal documents which support your claims in response to this question.

Response for this review
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

11. Does your organisation/business entity use sales contracts in the Australian market? If yes:
- What proportion of your sales revenue would come from contracted sales versus uncontracted sales?
  - Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?
  - How frequently are sales contracts renegotiated?
  - How frequently are price reviews conducted between contracts?
  - Do you provide opportunities for price reviews for customers within contracts? If yes, provide a description of the process and an explanation of the circumstances that might lead to a price review.
  - Do changes in your costs to make and sell enable you to review prices for customers within contracts?
  - Provide a list of the customers under contract during the review period and copies of the two largest contracts in terms of sales revenue.

Response for this review
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

12. Provide copies of any price lists for A4 copy paper used in the Australian market during the review period. If you do not use price lists, describe the transparency of your prices in the Australian market.

Response for this review
[Provide your response and/or further information here]
<a href="#">See responses at commencement of Section H.</a>

13. How do you differentiate pricing for different A4 copy paper products in the Australian market? Describe how your products are grouped for price differentiation and the methodology used. Describe any cost to make or selling cost differences between differentiated products. Describe how these cost differences (if any) influence pricing decisions. Provide copies of internal documents which support your claims in response to this question.

Response for this review
[Provide your response and/or further information here]



Response for this review
See responses at commencement of Section H.

14. Do you tier or segment your Australian A4 copy paper customers in terms of pricing? If yes, provide:
- a general description of how this is done;
  - list the factors that influence pricing differentiation in different tiers or segments; and
  - explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.

*Provide copies of internal documents which support your claims in response to this question.*

Response for this review
[Provide your response and/or further information here]
See responses at commencement of Section H.

15. Do you sell A4 copy paper to related entities in Australia? If yes, describe how prices are set for related party transactions and specify what proportion of your sales in terms of sales revenue are to related party entities. If available, provide copies of any internal documents relevant to establishing pricing to related parties.

Response for this review
[Provide your response and/or further information here]
See responses at commencement of Section H.

#### L-4 Marketing and sales support in the Australian market

1. How does your company market A4 copy paper in the Australian market? Include in your response the value proposition used (e.g. price, quality, reliability, availability, etc.).

Response for this review
[Provide your response and/or further information here]
See responses at commencement of Section H.

2. Does your company conduct brand segmentation in the Australian market for A4 copy paper? If yes, describe the brand segmentation used and provide the proportion of sales revenue derived from each brand segment.

Response for this review
[Provide your response and/or further information here]
See responses at commencement of Section H.

- 3. Provide examples of your Australian advertising of A4 copy paper over the past five years. If you have not used advertising in Australia, provide examples of any other A4 copy paper promotion campaigns you have conducted over the review period.

Response for this review
[Provide your response and/or further information here] <a href="#">See responses at commencement of Section H.</a>

- 4. How many people are in your Australian sales team and where are they located? In general terms, how are they remunerated? If they are offered performance pay based on sales, describe the performance indicators used to establish the performance pay. Provide copies of internal documents which support your claims in response to this question.

Response for this review
[Provide your response and/or further information here] <a href="#">See responses at commencement of Section H.</a>

- 5. Describe what parameters are provided to sales staff to assist in establishing pricing for A4 copy paper when negotiating sales with customers. Provide copies of internal documents which support your claims in response to this question.

Response for this review
[Provide your response and/or further information here] <a href="#">See responses at commencement of Section H.</a>

## **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.

### 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 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.

**The goods**

The goods subject to the anti-dumping measures

**Incoterms**

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

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

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 review period**

A period defined by the Commission cover which the exportations 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 review 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.

**APRIL**  
**Response to the Exporter Questionnaire (Indonesia)**  
**Paper Products Brochure**

Electronic 'brochures' of APRIL's paper products are available on its website. See:

<http://www.paperone.com/>