



Exporter Verification Report

Verification & Case Details

Initiation Date	16/04/2020	ADN:	2020/039
Case Number	551		
The goods under consideration	A4 copy paper		
Case type	Review of Measures		
Exporter	Double A (1991) Public Company Limited		
Location	Remote verification		
Verification from	13/07/2020	to	2/12/2020
Review Period	1/01/2019	to	31/12/2019

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

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1 COMPANY BACKGROUND

1.1 Corporate Structure and Ownership

Double A (1991) Public Company Limited (Double A) is a private company incorporated and domiciled in Thailand. Double A is a manufacturer and distributor of pulp, paper and stationery products and sells both domestically and into foreign markets. Double A has several related parties.

1.2 Related parties

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

1.2.1 Related suppliers

The verification team identified several related parties that were suppliers of raw materials or services used in the manufacture of the goods.

No.	Exception	Resolution
1	Double A provided a list of related parties in the REQ. An examination of the CTMS data showed that Double A purchased raw materials from related suppliers that it had not disclosed in the REQ.	During the verification process, Double A confirmed that these raw material suppliers were related parties.

Table 1: Exception regarding disclosure of related parties

1.2.2 Related customers

The verification team identified some goods were sold to a domestic agent and related party.

1.2.3 Other related parties

The verification team identified an international agent to be a related party.

1.3 Accounting records

Double A's audited financial statement was audited by EY and includes a statement that the financial accounts comply with the Thai Financial Reporting Standards. Therefore, the verification team considers that the accounting records held by the company are in accordance with the generally accepted accounting principles of Thailand.

2 THE GOODS AND LIKE GOODS

2.1 Production process

Double A is a fully integrated manufacturer of pulp, uncoated papers (including A4 copy paper) and stationery. A summary of the production process is as follows:

- *Logs to woodchips:* Double A removes the bark from logs using a debarking machine and converts the logs to small woodchips using a chipping machine.
- *Woodchips to pulp:* The woodchips are cooked with water and other chemicals to separate cellulose fibres from lignin. This process produces brown pulp and black liquor. The brown pulp is washed and bleached to make white pulp.
- *Pulp to paper:* Water and various chemicals are added to the pulp to create pulp slush which is distributed over a wire web in the headbox on the paper processing machines. Water is removed and the fibres begin to bond as the web of pulp forms a sheet (forming). The sheet passes through a series of rollers that squeeze out water (pressing) and then passes through cylinders that use steam to evaporate most of the remaining water (drying). The single, continuous sheet of paper is smoothed and compressed as it passes through a number of paired heated rollers (calendaring). Reeling follows calendaring, where the paper sheet is wound onto reel spools to form "jumbo" reels (size-press). The jumbo reels are finished and slit into smaller rolls using large cutting wheels (slitting). On the sheeting line, the sheeter rolls are further processed to specific end use dimensions (i.e. A4) on a trimmer or cutter.
- *Packaging and finishing:* Cut-size sheets are organised into reams which are wrapped in labelled packaging. The finished paper is then delivered to the customer or to Double A's warehouse.

There are no significant differences in the production process between the goods and like goods.

2.2 Model Control Codes (MCCs)

Double A provided sales and cost data in its REQ in accordance with the model control code (MCC) structure detailed in Anti-Dumping Notice (ADN) No. 2020/039, with one minor exception.

No.	Exception	Resolution
2	Double A provided MCC categorisation in the domestic cost to make data in the REQ. Double A reported a separate MCC categorisation, using identifier "Other", for non-Double A branded paper. An examination of the domestic sales data showed that they had not included the same MCC identifier in the domestic sales listing.	The verification team revised the MCC identifier for the relevant domestic sales.

Table 2: Exception during verification of MCC reporting in domestic sales data

2.2.1 Amendments to MCCs

Based on analysis of Double A's costs and sales in the review period, the verification team does not consider it necessary to make amendments to the MCC structure.

2.3 Verification of MCCs

Table 3 below provides detail on how the MCC sub-categories were determined and verified to source documents.

Category	Determination of the sub-category
Weight	Determined with reference to the description on customer's purchase, sales order, commercial invoice, packing list, shipping advices and credit note/goods return slips.
Recycled content	Determined with reference to product brochures and website and confirmed by exporter.

Table 3: MCC sub-category determination

2.4 The goods exported to Australia

The verification team was satisfied that Double A produced and exported the goods to Australia. Double A exported the goods to Australia with the following MCCs during the review period.

- 70-N
- 80-N
- 90-N
- 100-N

2.5 Like goods sold on the domestic market

The verification team was satisfied that Double A sold like goods in the domestic market.

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

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

PUBLIC RECORD

Double A sold like goods on the domestic market with the following MCCs during the review period:

- 70-N
- 80-N
- 90-N

2.6 Like goods – assessment

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

¹ References to any section in this report relate to provisions of the Act, unless specifically stated otherwise.

3 VERIFICATION OF SALES COMPLETENESS AND RELEVANCE

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

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

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

- The verification team reconciled the value of total sales from the income statement in the audited financial statement to the relevant consolidated financial statement accounts and the total amount of the sales ledgers.
- The verification team reconciled the value and volume of all woodchip, pulp and paper products including sales of the goods to the company's billing reports and sales ledgers.
- The verification team reconciled the value and volume of the goods to the domestic and Australian sales listings.

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

3.1 Sales completeness and relevance finding

The verification team is satisfied that the sales data provided by Double A is complete and relevant.

4 VERIFICATION OF SALES ACCURACY

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

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

Details of this verification process are contained in the verification work program and its relevant attachments, at **Confidential Attachment 1**.

4.1 Exceptions during verification of sales accuracy

No.	Exception	Resolution
3	Double A provided MCC categorisation for all Australian and domestic sales in the REQ. Verification team identified that one MCC had not been categorised with the correct weight identifier.	The verification team revised the weight identifier for the Australian and domestic relevant sales.
4	During the verification process, Double A identified that they had made a calculation error when calculating unit inland transport to the port of export charges for one quarter of the review period. The transport charges were underreported.	Double A provided a revised unit cost calculation for these charges. The verification team verified these revised calculation unit costs with the relevant source documentation and recalculated the inland transport costs for the relevant transactions.
5	Double A used a standard port handling and other expenses rate in their Australian sales listing. During the verification process, the verification team found that some portions of the actual port handling and other expenses were overstated while others were understated.	The verification team revised the unit port handling and other charges based on actual costs in the general ledger evidence provided by Double A.
6	In the Australian sales listing, Double A reported commission charges. During the verification process, the verification team found that these were inadvertently reported using a mix of AUD and THB currencies.	The verification team sought an explanation from Double A who confirmed the calculation should be made in THB and provided a revised data set that resolved the issue.
7	Double A calculated brand and channel marketing expenses using a notional exchange rate. During the verification process, the verification team found that this rate was slightly overstated resulting in the marketing expenses also being overstated.	The verification team calculated the average exchange rate over the review period using Double A's ledger and recalculated the marketing expenses for the relevant transactions.

Table 4: Exceptions during verification of accuracy of sales data

4.2 Sales accuracy finding

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

5 VERIFICATION OF COST TO MAKE AND SELL (CTMS) COMPLETENESS AND RELEVANCE

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

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

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

- The total cost of goods sold (COGS) was reconciled from the income statement within the 2019 audited financial statements to the financial system's general ledger.
- No timing adjustment was required to be made to the COGS given the accounting period and the review period are the same.
- Several cost adjustments were made to convert the COGS to cost of production, including change in finished goods inventory.
- The split of the total cost of goods sold between the goods under consideration (GUC) and non-goods was verified to the bill of materials.
- The split of the total cost of goods sold between domestic, Australian and third country sales cost of production was also verified to the bill of materials.
- General ledger stock reports was used to convert standard costs to actual costs.
- The total production cost and volume, as well as the costs and volumes for various products, was reconciled by tracing values via consolidated financial statement, general ledger stock reports, semi-finished goods inventory movement reports, mill reports to the relevant accounting ledgers.
- Then the total production cost and volume was reconciled to the CTMS information (actual costs) provided in the REQ.

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

- The total SG&A cost was identified in the income statement within the 2019 the audited financial statement, which equals the amount for the review period.
- The total SG&A cost was reconciled to the trial balance.
- The total SG&A cost was reconciled to the CTMS information provided in the REQ.

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

5.1 Exception during verification of completeness and relevance of CTMS data

No.	Exception	Resolution
8	Double A provided MCC categorisation for all Australian and domestic costs in the REQ. Verification team identified that one MCC had not been categorised with the correct weight identifier.	Double A submitted revised Australian and domestic CTM listings which included the correct MCC categorisation.

Table 5: Exception during verification of completeness and relevance of CTMS data

5.2 Completeness and relevance finding of CTMS data

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

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

6.1 Cost allocation method

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

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

Table 6 below outlines the allocation method applied to each cost item. Cost item	Method applied
Raw materials	Raw material costs were allocated on the basis of production quantity for the finished goods.
Scrap allocation	Double A applies a credit for a by-product, black liquor, against the total cost of production.
Manufacturing overheads	Manufacturing overheads costs were allocated on the basis of production quantity for the finished goods.
Direct labour	Direct labour costs were allocated on the basis of production quantity for the finished goods.
Depreciation	Depreciation costs were allocated on the basis of production quantity for the finished goods.
Variance (standard to actual costing)	The variance was allocated per tonne therefore on the basis of production quantity for the finished goods.

Table 6: Cost allocation method

6.2 Verification of accuracy of CTMS data

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

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

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

6.3 Exceptions during verification of accuracy of CTMS data

No.	Exception	Resolution
9	In response to question G-7 in the REQ, Double A provided a list of raw materials purchases. An examination of this list showed that Double A had not provided a full and complete raw materials purchase listing because woodchips and log purchases were not included.	During the verification process, Double A submitted additional raw materials purchases listings that included woodchip and log purchases.
10	In response to question G-7 in the REQ, Double A provided a list of raw materials purchases. During verification it was found that samples 6, 8 and 9 included purchase prices in the raw materials purchase listing that did not reconcile to the SAP ledger.	Double A advised that purchase prices were incorrectly recorded and adjustments were made in the general ledger to reflect the correct purchase prices. Double A submitted relevant source documents to support the adjustments made.

Table 7: Exceptions during verification of accuracy of CTMS data

6.4 Related party suppliers

The verification team found that Double A purchased various raw materials from related suppliers. The verification team conducted a price comparison analysis in respect of each raw material purchased from a related supplier and found that prices were comparable between related and unrelated suppliers. Based on this assessment, the verification team considers that the purchases from related suppliers reflected arms length transactions.

6.5 Accuracy finding

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

7 EXPORT PRICE

7.1 The importers

The verification team does not consider Double A's Australian customers to be the beneficial owners of the goods at the time of importation, and therefore were not the importers of the goods.

The verification team considers Double A to be the beneficial owner of the goods at the time of importation as Double A is:

- named as the consignee on the bill of lading,
- declared as the owner and supplier of the goods on the importation declaration to the Australian Border Force;
- paid for all the importation charges including interim dumping duties; and
- arranged delivery from the port to the Australian customer in accordance with the relevant terms of all export sales.

The verification team therefore considers Double A to be the importer of the goods.

7.2 The exporter

The verification team considers Double A to be the exporter of the goods,² as Double A is:

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

The verification team is satisfied that for all Australian export sales during the review period that Double A is the exporter of the goods.

7.3 Arms length

7.3.1 Unrelated customers

In respect of Double A's Australian sales of the goods to its unrelated customers during the review period, the verification team found no evidence that:

- there was any consideration payable for, or in respect of, the goods other than its price; or

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

- the price appeared to be influenced by a commercial or other relationship between the buyer, or an associate of the buyer, and the seller, or an associate of the seller; or
- the buyer, or an associate of the buyer, was directly or indirectly reimbursed, compensated or otherwise received a benefit for, or in respect of, the whole or any part of the price.³

The verification team therefore considers that all export sales made by Double A to its unrelated Australian customers during the review period were arms length transactions.

7.4 Export price – assessment

In respect of Australian sales of the goods by Double A, the verification team recommends that the export price be determined under section 269TAB(1)(c), having regard to all the circumstances of exportation. The verification team recommend that the export price be determined as the price paid by the Australian customer to Double A less dumping duties, transport and other costs arising after exportation.

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

³ Section 269TAA refers.

8 DOMESTIC SALES

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

8.1 Arms length

8.1.1 Related party customers

In respect of Double A's domestic sales of like goods to its related domestic agent customer during the review period, the verification team found no evidence that there was any consideration payable for, or in respect of, the goods other than their price.

However, the verification team found evidence that the price appeared to be influenced by a commercial or other relationship between the buyer, or an associate of the buyer, and the seller, or an associate of the seller. The verification team also found evidence that the buyer, or an associate of the buyer, was directly or indirectly reimbursed, compensated or otherwise receive a benefit for, or in respect of, the whole or any part of the price.⁴ The verification team therefore considers that domestic sales made by Double A to its related domestic agent customer during the review period were not arms length transactions, pursuant to section 269TAA(1)(b).⁵ These sales were excluded from normal value calculations.

Details of this verification process are contained in the verification work program and its relevant attachments, at **Confidential Attachment 1**.

8.1.2 Unrelated customers

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

- there was any consideration payable for, or in respect of, the goods other than its price; or
- the price appeared to be influenced by a commercial or other relationship between the buyer, or an associate of the buyer, and the seller, or an associate of the seller; or
- the buyer, or an associate of the buyer, was directly or indirectly reimbursed, compensated or otherwise received a benefit for, or in respect of, the whole or any part of the price.

⁴ See section 269TAA(1)(c).

⁵ The Commission notes that the finding in this report that the sales to domestic customers did not take place on an arms length basis relates to the assessment of export prices for anti-dumping purposes under section 269TAC. It is not an assessment of the exporter's transfer pricing policy with respect to compliance with the revenue laws of any jurisdiction.

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

8.2 Ordinary course of trade

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

- unprofitable in substantial quantities over an extended period; and
- unlikely to be recoverable within a reasonable period.⁶

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

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

The team tested recoverability by comparing the price at ex-works against the relevant weighted average cost over the review period for each domestic sales transaction. The following table sets out further detail:

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

Table 8: OCOT details

8.3 Volume of relevant sales

Section 269TAC(2) provides alternative methods for calculating the normal value of goods exported to Australia where there is an absence, or low volume, of relevant sales of like goods in the market of the country of export. An exporter's domestic sales of like goods are taken to be in a low volume under section 269TAC(14) where the total volume of sales of like goods for home consumption in the country of export by the exporter is less than five per cent of the total volume of the goods under consideration that are exported to Australia by the exporter (unless the Minister is satisfied that the volume is still large enough to permit a proper comparison for the purposes of assessing a dumping margin).

⁶ In general, the Commission will consider 'extended period' and 'reasonable period' to be the investigation, review or inquiry period.

PUBLIC RECORD

The verification team assessed the total volume of relevant sales of like goods as a percentage of the goods exported to Australia and found that the volume of domestic sales was five per cent or greater and therefore was not a low volume.

When calculating a normal value under section 269TAC(1), in order to ensure a proper comparison between the goods exported to Australia and the goods sold on the domestic market, the Commission considers the volume of sales of each exported MCC on the domestic market. Where the volume of domestic sales of an exported model is less than five per cent of the volume exported, the Commission will consider whether a proper comparison can be made at the MCC level. In these situations, the Commission may consider whether a surrogate domestic model should be used to calculate normal value for the exported model.

This analysis is detailed in the table below.

Export MCC	Is volume of domestic sales of the same MCC 5% or greater as a proportion of export volume?	Treatment of normal value
70-N	Y	Domestic sales of 70-N
80-N	Y	Domestic sales of 80-N
90-N	Y	Domestic sales of 90-N
100-N	N	No domestic sales of 100-N. Surrogate model 90-N substituted for 100-N

Table 9: Domestic volumes

The verification team’s volume analysis is at **Confidential Appendix 3**.

9 ADJUSTMENTS

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

9.1 Rationale and method

Adjustment type	Assessment for adjustment	Calculation method and evidence	Claimed in REQ?	Adjustment required?
Domestic credit terms	Double A offered credit terms for domestic customers.	The domestic credit rate is based on the short term borrowing rate applied to the weighted average number of payment days.	No	Yes
Domestic inland transport	Double A incurred inland transport expenses for all domestic sales.	Weighted average unit value based on the total inland transport costs and invoice quantity.	No	Yes
Domestic sales commissions	Double A paid commissions to a related entity to develop the domestic market.	Actual commission costs.	Yes	Yes
Domestic off invoice rebates	Double A provided off-invoice rebates.	Rebates were allocated using rates equal to the total year's expense divided by the total year's domestic sales.	No	Yes
Domestic marketing programs	Double A incurred expenses for marketing programs relevant to the goods. Channel marketing expenses (CME) are sales promotions and brand marketing expenses (BME) are advertising and branding activities.	CME and BME were allocated using rates equal to the total year's expense divided by the total year's domestic sales.	No	Yes
Export inland transport	Double A incurred inland transport expenses for all Australian sales.	Weighted average unit value based on actual inland transport costs and invoice quantity.	No	Yes

PUBLIC RECORD

Export port handling charges	Double A incurred port handling expenses for all Australian sales.	Average unit value based on total year's expenses divided by the total year's number of containers or shipments and invoice quantity.	No	Yes
Export sales commissions	Double A paid commissions to an entity to develop the Australian market.	Actual commission costs.	Yes	Yes
Export marketing programs	Double A incurred expenses for marketing programs relevant to the goods. CME are sales promotions and BME are advertising and branding activities.	CME and BME were allocated using rates equal to the total year's expense divided by the total year's domestic sales.	No	Yes
Export credit terms	Double A offered credit terms for Australian customers.	The export credit rate is based on the short term borrowing rate applied to the weighted average number of payment days.	No	Yes

Table 10: Assessment of adjustments

9.2 Adjustments

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

Adjustment type	Deduction/addition
Domestic credit terms	Deduct an amount for domestic credit
Domestic inland transport	Deduct an amount for domestic inland transport
Domestic sales commissions	Deduct an amount for domestic commissions
Domestic off invoice rebates	Deduct an amount for domestic off invoice rebates
Domestic marketing programs	Deduct an amount for domestic marketing programs
Export inland transport	Add an amount for export inland transport
Export port charges	Add an amount for port charges
Export sales commissions	Add an amount for export commissions
Export marketing programs	Add an amount for export marketing programs
Export credit terms	Add an amount for export credit terms

Table 11: Summary of adjustments

PUBLIC RECORD

The verification team's preliminary adjustment calculations are included in normal value calculations at **Confidential Appendix 3**.

10 NORMAL VALUE

The verification team found that there were sufficient volumes of sales of like goods sold for home consumption in the country of export that were arms length transactions and at prices that were within the OCOT. The verification team is therefore not satisfied that there is an absence, or low volume, of sales relevant for the purpose of determining a price under section 269TAC(1).

The verification team has determined a preliminary normal value under section 269TAC(1).

In using domestic sales as a basis for normal value, the verification team considers that certain adjustments, in accordance with section 269TAC(8), are necessary to ensure that differences between the normal value of goods exported to Australia and the export price of the exported goods would not affect comparison of domestic prices with export prices, as outlined in chapter 0 above.

The verification team's preliminary normal value calculations are at **Confidential Appendix 3**.

11 DUMPING MARGIN

The dumping margin was assessed by comparing weighted average Australian export prices to the corresponding quarterly weighted average normal value for the review period.

The dumping margin for the goods exported to Australia by Double A for the review period is **30.8 per cent**.

The preliminary dumping margin calculation is at **Confidential Appendix 4**.

12 APPENDICES AND ATTACHMENTS

Confidential Appendix 1	Export price
Confidential Appendix 2	Cost to make and sell
Confidential Appendix 3	Domestic sales, OCOT, profitability and normal value
Confidential Appendix 4	Dumping margin
Confidential Attachment 1	Verification work program