



Australian Government
Department of Industry, Science,
Energy and Resources

Anti-Dumping Commission

Exporter Questionnaire

Case number: Accelerated Review 603

Product: Wind Towers

From: The People's Republic of China

Period of review: 1 January 2021 to 31 December 2021

Response due by: 3 May 2022

Email enquiries to: Investigations3@adcommission.gov.au

Anti-Dumping Commission website: www.adcommission.gov.au

Responses to the exporter questionnaire must be submitted via SIGBOX. Please contact the commission on the above email address to request access to SIGBOX.

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INSTRUCTIONS

Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the commission) is conducting an accelerated review into wind towers exported to Australia from the People's Republic of China (China).

The commission will use the information you provide to determine normal values and export prices over the review period (the period).

The commission will collect and use information in accordance with the commission's Collection and Use of Information Policy.

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 via SIGBOX, a secure online document repository. Please contact the commission on the email address listed on the cover page to request access to SIGBOX.

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 considered as an uncooperative exporter.

Confidential and non-confidential responses

You are required to lodge a confidential version (OFFICIAL: Sensitive) and a non-confidential version (for publishing on the 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 "**OFFICIAL: Sensitive**" 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 without breaching confidentiality.

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 requested to resubmit your response with the required level of detail or, if deadlines have passed, the commission may not have regard to it.

Verification of the information that you supply

The commission may wish to conduct a verification of your questionnaire response for completeness, relevance and accuracy of the information to your company's records.

The verification 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.

The verification may include Commission staff visiting your company to conduct on onsite verification¹. Any onsite verification typically commences approximately 2 to 4 weeks after the due date of the response to the exporter questionnaire. To assist with the planning of a verification, please contact the commission as soon as possible for a potential verification date to be scheduled.

¹ The Commission has temporarily suspended onsite verification due to the COVID-19 pandemic (refer to Anti-Dumping Notice No. 2020/29). However, your response to the exporter questionnaire may still be subject to onsite verification should the suspension of onsite verifications be lifted.

The onsite verification is usually conducted over 4 days. However, in complex cases, it may be scheduled over 5 days. A verification will include a detailed examination of your company's records and we will collect copies of relevant documents. The verification will require the participation of key staff, including your financial accountant, production manager and sales staff. A tour of the manufacturing facility may also be required during the verification.

The commission may elect to undertake an alternative verification methodology, rather than an onsite verification, to satisfy itself of the completeness, relevance and accuracy of the data.

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

A report will be prepared following the verification, 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 margin. The commission considers that the dumping 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. To the extent that the foreign language version differs, the English translation will be given priority as a matter of interpretation in Australia.
- 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 commission as soon as possible.
- Where possible, electronic data should be 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.

| Section | Please tick if you have responded to all questions | | | | |
|---|---|---------------|---|---|---|
| Section A Company information | ✓ | | | | |
| Section B Export sales to Australia | ✓ | | | | |
| Section C Exported goods & like goods | ✓ | | | | |
| <p>Answer: The goods sold on the domestic market are complete towers and tower basic rings.</p> <p>1. Provide a detailed explanation of the differences those goods sold domestically (i.e. the like good explanation in glossary) are not identical to exported to Australia.</p> <table border="1" data-bbox="513 1021 1013 1422"> <thead> <tr> <th data-bbox="513 1021 820 1055">EXPORTED TYPE</th> <th data-bbox="820 1021 1013 1055">DOMESTIC TYPE</th> </tr> </thead> <tbody> <tr> <td data-bbox="513 1055 820 1422">Product code of each model of the goods exported to Australia</td> <td data-bbox="820 1055 1013 1422">Product code of comparable model sold on the domestic market of the country of export</td> </tr> </tbody> </table> <p>Answer: Not applicable. The Respondent did not export the goods to Australia during the period.</p> <p>C-3 Internal product codes</p> <p>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</p> | EXPORTED TYPE | DOMESTIC TYPE | Product code of each model of the goods exported to Australia | Product code of comparable model sold on the domestic market of the country of export | ✓ |
| EXPORTED TYPE | DOMESTIC TYPE | | | | |
| Product code of each model of the goods exported to Australia | Product code of comparable model sold on the domestic market of the country of export | | | | |

| | |
|--|---|
| <p>each code within the product or SKU code.</p> <p>(b) Provide details on how you mapped the product or SKU codes for the purpose of completing this questionnaire.</p> <p>(c) Provide a table of showing the product or SKU codes for each goods.</p> <p>If no:</p> <p>(a) Provide details on the method used to identify the goods in the sales and cost spreadsheets.</p> <p><u>Answer:</u></p> <p>The Respondent uses stock keeping unit (SKU) codes.</p> <p>The SKU coding system is [Sensitive].</p> <p>[Sensitive information regarding the SKU coding system]</p> <p>[Sensitive].</p> <p>[Sensitive information regarding the method of mapping SKU codes for the purpose of completing this questionnaire]</p> <p>Please refer to <u>Attachment C-3.1</u> for the table of SKU codes for the goods sold domestically.</p> | |
| Section D Domestic sales | |
| Section E Due allowance | ✓ |
| Section F Third country sales | ✓ |
| Section G Cost to make and sell | ✓ |
| Exporter's declaration | ✓ |
| Non-confidential version of this response | ✓ |

| Attachments | Please tick if you have provided spreadsheet |
|------------------------------|--|
| B-2 Australian sales | |
| B-4 Upwards sales | ✓ |
| B-5 Upwards selling expenses | ✓ |
| D-2 Domestic sales | ✓ |
| F-2 Third country sales | ✓ |
| G-3 Domestic CTM | ✓ |

| | |
|------------------------------|---|
| G-4.1 SG&A listing | ✓ |
| G-4.2 Dom SG&A calculation | ✓ |
| G-5 Australian CTM | |
| G-7.2 Raw material CTM | |
| G-7.4 Raw material purchases | ✓ |
| G-8 Upwards costs | ✓ |

GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES

The goods under consideration (the goods) i.e. the goods exported to Australia, are:

Certain utility scale wind towers, whether or not tapered, and sections thereof (whether exported assembled or unassembled), and whether or not including an embed being a tower foundation section.

Wind turbines that have electrical power generation capacities equal to or in excess of 1.00 megawatt (MW) and with a minimum height of 50 metres measured from the base of the tower to the bottom of the nacelle (i.e. where the top of the tower and nacelle are joined) when fully assembled.

A wind tower section consists of, at a minimum, multiple steel plates rolled into cylindrical or conical shapes and welded together (or otherwise attached) to form a steel shell, regardless of coating, end-finish, painting, treatment or method of manufacture, and with or without flanges, doors, or internal or external components (e.g., flooring/decking, ladders, lifts, electrical junction boxes, electrical cabling, conduit, cable harness for nacelle generator, interior lighting, tool and storage lockers) attached to the wind tower section.

Additional information

Goods specifically excluded from the scope are nacelles and rotor blades, regardless of whether they are attached to the wind tower. Any internal or external components which are not attached to the wind towers or sections thereof are also excluded.

The goods may be classified to 7308.20.00 in Schedule 3 to the Customs Tariff Act 1995 (see below). This applies to complete towers, unassembled or assembled, and applies to a basic tower that includes doors, ladders, landings and embed or tower foundation. Steel tower sections, including sections with doors etc. are classified to 7308.90.00, assembled or disassembled, provided there aren't enough in a shipment to be judged to be a complete tower.

Combinations of towers and tower sections may vary on a case by case basis for assessment of tariff classification. Classification may vary when there is more of one item than another, for example a tower section and lift or a tower section with lift, electrical junction boxes and other equipment. An assembled complete wind powered generator is a composite machine consisting of two or more machines fitted together to form a whole; wind engine, generator, gearbox, yaw controls etc. fitted in a steel tower and nacelle, and has a classification to subheading 8502.31.10.

Tariff classifications

The goods, as per the description above, may be classified to tariff subheadings 7308.20.00 (statistical codes 03 and 04); 7308.90.00 (statistical codes 52, 53, 54, 55, 56, 63 and 65); and 8502.31.10 (statistical code 31) in Schedule 3 to the *Customs Tariff Act 1995*.

SECTION A COMPANY INFORMATION

A-1 Company representative and location

1. Please nominate a contact person within your company:

Name: **Kim, Jungsoo**

Position in the company: **[Sensitive]**

Telephone: **[Sensitive]**

E-mail address: **[Sensitive]**

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

Name: **East & Concord Partners**

Address: **20th/F, Landmark Tower 1, 8 North Dongsanhuan Road, Beijing 100004 China**

Telephone: **86-10-65107050**

E-mail address: **vivian_wang@east-concord.com**

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 your company's financial records are held.

Answer:

The location where the Respondent's financial records are held is 30# Yunyang Road, LianYungang Economic & Technological Development Zone, Jiangsu, China.

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

Answer:

The location where the Respondent's production records are held is 30# Yunyang Road, LianYungang Economic & Technological Development Zone, Jiangsu, China.

5. Please provide the location of your company's production plant manufacturing the goods under consideration.

Answer:

The location where the Respondent's production plant manufacturing the goods under consideration are held is 30# Yunyang Road, LianYungang Economic & Technological Development Zone, Jiangsu, China.

A-2 Company information

1. What is the legal name of your business?

Answer:

The legal name of the company is CS Wind China Co., Ltd (Hereinafter referred to as “the Respondent”).

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

Answer:

The Respondent does not use other business names to export and/or sell goods.

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

Answer:

The Respondent changed its English legal name from CS Wind Tech Co., Ltd to CS Wind China Co., Ltd on 15th June 2011.

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

Answer:

The list of current board of directors is as follows:

[Sensitive].

[Sensitive information regarding the names of directors and their title.]

The list of board of directors changed on 16th December 2020 to the current list. Before 16th December 2020, the board of directors included [Sensitive].

[Sensitive information regarding the names of directors.]

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

Answer:

Please refer [Attachment A-2.5.1](#) for the complete ownership structure.

Please refer [Attachment A-2.5.2](#) for the list of all related companies and their functions.

6. Is your company or parent company publically listed?
If yes, please provide:
- (a) The stock exchange where it is listed; and

(b) Any principle shareholders²
If no, please provide:

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

Answer:

The Respondent's parent company, CS WIND Corporation, is a publically listed company, which is listed on KOSPI market.

The principal shareholders of CS WIND Corporation are Gim Seong Gon and Korea National Pension Service.

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

Answer:

The Respondent manufactures and sells wind towers.

The main markets the Respondent sells into include the domestic market, Latin America, Korea, Japan, Vietnam, and Canada.

8. If your business does not perform all of the following functions in relation to the goods under consideration, then please provide names and addresses of the companies which perform each function:
- (a) produce or manufacture;
 - (b) sell in the domestic market;
 - (c) export to Australia; and
 - (d) export to countries other than Australia.

Answer:

Not applicable. The Respondent performs all the above functions in relation to the goods under consideration.

9. Provide your company's internal organisation chart.

Answer:

Please refer to Attachment A-2.9 for the internal organisation chart.

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

Answer:

² 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.

[Sensitive].

[Sensitive information regarding the functions performed by each group within the organisation.]

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

Answer:

Please refer to [Attachment A-2.11](#) for the brochure.

A-3 General accounting information

1. What is your financial accounting period?

Answer:

The Respondent's accounting period is the calendar year starting from January 1st to December 31st.

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

Answer:

The financial accounts of the Respondent have been audited.

The auditors are [Sensitive].

[Sensitive information regarding the names of the auditors.]

3. What currency are your accounts kept in?

Answer:

The accounts of the Respondent are kept in RMB.

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

Answer:

The Respondent's financial accounting system is SAP.

5. What is the name of your sales system?

Answer:

The Respondent's sales system is SAP.

6. What is the name of your production system?

Answer:

The Respondent's production system is MES.

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.

Answer:

At the end of each month, relevant staff summarizes and transfers data in MES to SAP System.

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

Answer:

The Respondent's accounting practices are in accordance with China's generally accepted accounting practices.

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

Answer:

There have been no changes to the Respondent's accounting practices and/or policies over the last two years.

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.

Answer:

Please refer to [Attachment A-4.1](#) for the audited reports of 2020 and 2021 for the Respondent.

2. If the financial statements in A-4.1 are audited, provide a copy of the audit management letters from your auditor accompanying the audited financial statements.

Answer:

Please refer to Attachment A-4.1 for the copy of the audit management letters from the Respondent's auditor accompanying the audited financial statements.

3. 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.

Answer:

Not applicable. The Respondent's financial statements in A-4.1 have been audited.

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

Answer:

Not applicable. The Respondent does not maintain different profit centres.

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

Answer:

The period is the same as the Respondent's financial period, therefore, this question is not applicable.

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

Answer:

Please refer to [Attachment A-4.6](#) for the trial balance covering the period and the year 2020.

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

Answer:

Please refer to [Attachment A-4.7](#) for the 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

B-1 Australian export sales process

1. Provide details (and diagrams if appropriate) of the export sales process of your company and representatives (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

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period.

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?

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period.

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.

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period.

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

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period.

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.

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period.

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

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period.

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

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period.

8. In establishing the date of sale, the commission will normally use the date of invoice as it best reflects the material terms of sale. If you are making a claim that a different date should be taken as the date of sale:
- (a) What date are you claiming as the date of sale?
 - (b) Why does this date best reflect the material terms of sale?

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period.

B-2 Australian sales listing

1. Complete the worksheet named "B-2 Australian sales"
 - This worksheet lists all sales (i.e. transaction by transaction) exported to Australia of the goods invoiced within the period. This includes exports to Australia sold through a domestic customer.
 - This worksheet must also include exports of the goods that have been exempted from anti-dumping duties under 8(7) and section 10(8) of the *Customs Tariff (Anti-Dumping) Act 1975*³.
 - 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.

³ Ministerial Exemption Instrument No. 2 2018 (2018/19) and Ministerial Exemption Instrument No. 5 of 2018 (ADN 2018/148)

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period.

2. Complete worksheet "B-2.2 Australian sales source" showing the relevant source of the data used for each column of worksheet "B-2 Australian sales".

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period.

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 & marine insurance (if applicable)
 - Country of origin certificates (if applicable)

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period.

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.

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period.

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.

Answer:

Please refer to [Attachment B-4.1](#) for B-4 Upwards sales worksheet.

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.

Answer:

Please refer to [Attachment B-4.2](#) for the supporting documents of B-4 Upwards sales worksheet.

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; and
 - provide the account code and sub-account code (if applicable) at column E of the worksheet.

Answer:

Please refer to [Attachment B-4.1](#) and [Attachment B-4.2](#) for the documents requested.

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.

Answer:

Please refer to [Attachment B-5.1](#) for B-5 Upwards selling expense worksheet.

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.

Answer:

Please refer to [Attachment B-5.2](#) for the supporting documents of B-5 Upwards selling expense worksheet.

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; and
 - provide the account code and sub-account code (if applicable) at column D of the worksheet.

Answer:

Please refer to Attachment B-5.1 and Attachment B-5.2 for the documents requested.

SECTION C EXPORTED GOODS & LIKE GOODS

C-1 Models exported to Australia

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

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period.

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

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period.

C-2 Models sold in the domestic market

2. Fully describe all like goods your company sold on the domestic market during the period. Include specification details and any technical and illustrative material that may be helpful in identifying, or classifying, the like goods sold on the domestic market.

Answer:

Please refer to Attachment C-2.1 for the description of the goods sold on the domestic market during the period.

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

Answer:

The goods sold on the domestic market are complete towers and tower basic rings.

4. Provide a detailed explanation of the differences where those goods sold domestically (i.e. the like goods – see explanation in glossary) are not identical to goods exported to Australia.

| EXPORTED TYPE | DOMESTIC TYPE | IDENTICAL? | DIFFERENCES |
|---|---|--|---|
| Product code of each model of the goods exported to Australia | Product code of comparable model sold on the domestic market of the country | If goods are identical, indicate "YES", otherwise "NO" | Where the goods exported to Australia are not identical to the like goods, describe |

| | | | |
|--|-----------|--|---|
| | of export | | specification differences. If it is impractical to detail specification differences in this table, refer to documents which outline differences |
|--|-----------|--|---|

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period.

C-3 Internal product codes

2. 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 for the purpose of completing this questionnaire.
- (c) Provide a table of showing the product or SKU codes for each goods.

If no:

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

Answer:

The Respondent uses stock keeping unit (SKU) codes.

The SKU coding system is [Sensitive].

[Sensitive information regarding the SKU coding system]

[Sensitive].

[Sensitive information regarding the method of mapping SKU codes for the purpose of completing this questionnaire]

Please refer to [Attachment C-3.1](#) for the table of SKU codes for the goods sold domestically.

SECTION D DOMESTIC SALES

If your company did not sell like goods on the domestic market during the review period, please contact the commission as soon as possible. You may be required to complete this section (and G-3) as it relates to export sales to third countries. 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.

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:

Answer:

Please refer to [Attachment D-1.1](#) for domestic sales process.

- (a) Marketing and advertising activities

Answer:

Regarding marketing and advertising activities for domestic sales, the Respondent participates in exhibitions and industrial conferences, makes advertising materials, and communicates to customers.

- (b) Price determination and/or negotiation process

Answer:

The price determination and/or negotiation process includes three steps. Firstly, the Respondent participates in the bid, which normally includes 3 to 5 companies. Secondly, the Respondent competes with other companies by bidding prices down through a customer's online bidding system. Finally, the bid-winner would be determined according to specific rules.

- (c) Order placement process

Answer:

The Respondent may have different order placement processes among customers. On the one hand, the Respondent may place customers with a simple order without detailed provisions. The order only demonstrates quantity, price, and delivery location. On the other hand, the Respondent may negotiate a formal contract with customers, including commercial terms, quantity, price, the date of delivery, etc.

(d) Order fulfilment process and lead time

Answer:

Before accepting the order, the Respondent needs to confirm the date of delivery. Then, the Respondent can evaluate whether its production capacity can meet the demand of the order.

After accepting the order, the Respondent arranges a detailed manufacturing plan and organizes raw materials purchasing according to this plan together with other preparations.

(e) Delivery terms and process

Answer:

The Respondent is responsible for arranging delivery to customers' work sites.

(f) Invoicing process

Answer:

The invoices are issued in the same month that the customers' representative accepts the product on site.

(g) Payment terms and process

Answer:

The Respondent's Payment process includes four steps:

Firstly, customers pay the advance payment.

Secondly, customers pay for material preparation.

Thirdly, the customers pay based on delivery progress of the finished product.

Fourthly, the final payment would be paid after the last batch of the goods is delivered and a full year of trial operation.

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.

Answer:

No domestic customer is related to the Respondent.

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

Answer:

Not applicable. The sales are not in accordance with price lists or price extras list.

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.

Answer:

The domestic selling prices do not vary according to the distribution channel.

5. Did you provide on-invoice discounts and/or off-invoice rebates to the customer or an associate of the customer in relation to the sale of the like goods during the period? If yes, provide a description; and explain the terms and conditions that must be met by the customer to obtain the discount and/or rebate.

Answer:

The Respondent does not provide on-invoice discounts and/or off-invoice rebates to the customer or an associate of the customer in relation to the sale of the like goods during the period.

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

Answer:

The Respondent does not issue credit or debit notes (directly or indirectly) to the customer or associate of the customer in relation to the sale of the like goods during the period.

7. In establishing the date of sale, the commission will normally use the date of invoice as it best reflects the material terms of sale. If you are making a claim that a different date should be taken as the date of sale:

- (a) What date are you claiming as the date of sale?
- (b) Why does this date best reflect the material terms of sale?

Answer:

The Respondent uses the date of invoice as the date of sale.

D-2 Domestic sales listing

1. Complete the worksheet named “D-2 Domestic sales”
 - This worksheet lists all domestic sales (i.e. transaction by transaction) of like goods invoiced within the period, even if they are models not exported to Australia
 - If you have claimed in B-1.8 and/or D-1.7 that the date of sale is one other than the invoice date, then add the sales within your claimed date of sale.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
 - If there are any other costs, charges or expenses incurred in respect of the sales listed which have not been identified in the table in question D-2 above, add a column for each item. For example, certain other selling expenses incurred.

Answer:

Please refer to [Attachment D-2.1](#) for D-2 Domestic sales worksheet.

2. Complete worksheet “D-2.2 domestic sales source” listing the source of the data used for each column in worksheet “D-2 domestic sales”.

Answer:

Please refer to [Attachment D-2.2](#) for the list of data source for 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

Answer:

Please refer to [Attachment D-3.1](#) for the documentation for the two largest invoices by value.

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.

Answer:

Please refer to [Attachment D-3.2](#) for the reconciliation table for documents and D-2 Domestic sales.

D-4 Reconciliation of sales to financial accounts

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

Answer:

Since the Respondent have completed B-4, this section is not applicable.

1. Please complete the worksheet named "B-4 Upwards sales" to demonstrate that the sales listings in D-2 and F-2 are complete.
 - You must provide this list in electronic format using the template provided.
 - Please use the currency that your accounts are kept in.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
2. Please provide all documents, other than those in A-4, D-2 and F-2, required to complete the "B-4 Upwards sales" worksheet. If the documents include spreadsheets, all formulas used must be retained.
3. For any amount in the "B-4 Upwards sales" worksheet that is hard coded (i.e. not a formula), please cross-reference by providing:
 - 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; and
 - provide the account code and sub-account code (if applicable) at column E of the worksheet.

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

Answer:

The Respondent does not provide rolling credit facilities to its domestic customers; therefore, the above questions are not applicable.

- (b) Do you have short term borrowings or an overdraft facility? If yes, what is the interest rate, or average of interest rates?

Answer:

The Respondent has short term borrowings. The interest rate was [Sensitive].

[Sensitive information regarding the interest rate of the Respondent's short term borrowings].

- (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?

Answer:

The Respondent does not have term deposits or other cash product.

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:

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

- (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 Australian customer (credit sales divided by the average accounts receivable).

- ii. Calculate the average credit term for each Australian 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. Do you have 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?

E-2 Packaging

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

Answer:

The packing used for domestic sales of like goods includes [Sensitive].

[Sensitive information regarding packing materials for domestic sales of like goods].

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

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

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

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

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?

Answer:

The domestic sales of like goods are delivered to the customers. The transportation costs are reported in the domestic sales listing in D-2 based on the actual transportation costs in the invoices.

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

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

3. If the delivery terms of the Australian sales includes delivery to the port, how was the inland transport calculated in the Australian sales listing in B-2?

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

4. If the delivery terms of the Australian sales includes port handling and other export charges, how were these expenses calculated in the Australian sales listing in B-2?

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

5. 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?

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

6. 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?

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

7. 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?

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

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.

Answer:

There are no sales commissions for domestic sales of like goods and/or export sales of the goods.

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?

Answer:

If the Respondent issues VAT special invoice, the VAT rate is 13%. If the Respondent issues VAT general invoice, the VAT rate is 0%.

- How is VAT accounted for in your records in relation to sales of the goods and like goods?

Answer:

The VAT accounted for in the Respondent's record is based on the VAT invoices.

- Do you receive a VAT refund in relation to sales of the goods and/or like goods?

Answer:

The Respondent has received a VAT refund in relation to sales of the goods to third countries.

- Do you receive a remission or drawback of import duties on inputs consumed in the productions of the goods or like goods?

Answer:

The Respondent received the remission of import duties on inputs consumed in the productions of the goods before July 2021 and did not receive the remission after July 2021.

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

Answer:

No other direct selling expenses incurred by your company in relation to domestic sales of like goods

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

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

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.

Answer:

None.

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.

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

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.

Answer:

[Sensitive].

[Sensitive information regarding the name of the Respondent's related third country customer and the basis for setting the selling price].

3. In establishing the date of sale, the commission will normally use the date of invoice as it best reflects the material terms of sale. If you are making a claim that a different date should be taken as the date of sale:
 - (a) What date are you claiming as the date of sale?
 - (b) Why does this date best reflect the material terms of sale?

Answer:

The date of tax invoice has been used as the date of sale.

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, customer, to third countries of like goods invoiced within the period.
 - While sales may be made in different currencies and on different shipping terms the sales listing also seeks to record an Ex-works value of these sales in your local currency.
 - 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.

Answer:

Please refer to [Attachment F-2.1](#) for F-2 Third country sales worksheet.

2. Complete worksheet "F-2.2 third country sales source" listing the source of the data for each column in the worksheet "F-2 third country sales".

Answer:

Please refer to [Attachment F-2.2](#) for the list of data source for the third country sales listing.

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.

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

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.

Answer:

Please refer to [Attachment G-1.1](#) for the production process the goods.

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.

Answer:

One of the Respondent’s suppliers is related to the Respondent, named [Sensitive]. The products supplied by the related company include [Sensitive].

[Sensitive information regarding the name of the related supplier and the product or services supplied by the related company].

3. Provide information about your company's total production in the following table:

| | Previous financial year | Most recent financial year | Investigation period |
|---|-------------------------|----------------------------|----------------------|
| A – Production capacity (e.g. number of wind towers and sections thereof)* | | | |
| B – Actual production in volume (e.g. number of wind towers and sections thereof) | | | |
| C – Capacity utilisation (%) (B/A x 100) | | | |

* rather than showing a 'name-plate' optimal capacity it is more meaningful to show the maximum level of production that may reasonably be attained under normal operating conditions. For example, assuming normal levels of maintenance and repair, a number of shifts and hours of operation that is not abnormally high, and a typical production mix.

Provide this information in the “G-1 Production” spreadsheet in the “Exporter Questionnaire – Attachment” Excel workbook.

Answer:

Please refer to [Attachment G-1.3](#) for “G-1 Production” spreadsheet.

G-2. Cost accounting practices

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

Answer:

The Respondent's cost accounting system is based on actual costs.

2. If your company uses standard costs:
- (a) Were standard costs used as the basis of actual costs in your responses G-3.1 & G-5.1?
 - (b) Have all variances (i.e. differences between standard and actual production costs) been allocated to the goods?
 - (c) How were those variances allocated?
 - (d) Provide details of any significant or unusual cost variances that occurred during the period.

Answer:

Not applicable. The Respondent's cost accounting system is not based on standard costs.

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.

Answer;

The Respondent has different cost centres, which are [Sensitive].

[Sensitive information regarding the names of different cost centres].

The allocation [Sensitive].

[Sensitive information regarding the allocation methodology used in the Respondent's accounting system].

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

Answer:

The Respondent accounts costs for each tower section.

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

Answer:

There is no difference between costs for management accounting purposes and financial accounting purposes.

6. Has your company engaged in any start-up operations in relation to the goods? If yes:

Answer:

The Respondent is not engaged in the start-up operation in relation to the goods; therefore, the following questions are not applicable.

- (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.
7. What is the method of valuation for raw material, work-in-progress, and finished goods inventories (e.g. last in first out –LIFO, first in first out- FIFO, weighted average)?

Answer:

Weighted average method is used for valuation for raw material and finished goods inventories.

Parallel carryover method is used for work-in-progress.

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

Answer:

There are no damaged or sub-standard goods generated at the various stages of production.

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

Answer:

Costs are not individually valued for scrap. There are no by products or joint products.

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

Answer:

None.

G-3 Cost to make on domestic market

1. Please provide (in the format shown in the table below) the actual unit cost to make and sell each model/type (identified in section C) of the like goods sold on the domestic market. Prepare this information in the “G-3 Domestic CTMS” spreadsheet in the “Exporter Questionnaire – Attachment” Excel workbook.

| Title of wind farm project | Project X | Project X |
|---|-----------|-----------|
| Customer name | | |
| Contract number | | |
| Contract date | | |
| Invoice number | | |
| Invoice date | | |
| Item (e.g. complete tower, embed) | | |
| Model specification / product code | | |
| Quantity | | |
| Delivery date | | |
| Variable manufacturing costs | | |
| Material – steel plate (for towers) | | |
| Material – flanges and flange bolts (for towers) | | |
| Material – steel plate (for embeds / foundation) | | |
| Material – flanges and flange bolts (for embeds / foundation) | | |
| Material – mechanical and electrical internal components | | |
| Material – lifts (where applicable) | | |
| Material – door frames, ladders (where applicable) | | |
| Material – paint | | |
| Material – packaging | | |
| Direct labour – manufacturing / production / packaging | | |
| Direct labour – testing, non-destructive testing (NDT) and QA | | |
| Other costs | | |
| Fixed manufacturing costs | | |
| Overheads | | |
| Depreciation | | |
| Finance charges | | |
| Other costs | | |
| Total cost to make | | |
| Selling costs | | |
| Administration and general costs | | |
| Financial costs | | |
| Delivery expenses | | |
| Other costs | | |
| Total cost to sell | | |
| Total cost to make and sell | | |
| Unit cost to make and sell | | |

Provide this information for each unique unit of the goods invoiced during the period of the investigation. For example, if one contract specifies production of two different types of the goods, provide this information for each type of the goods.

Provide the information broken down into fixed and variable costs, and indicate the % total cost represented by fixed costs.

If you are unable to supply this information in this format, please contact the case manager for this investigation.

Please specify unit of currency.

- The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each like good.
- If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture like goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
- You must provide this list in electronic format using the template provided.
- If you have used formulas to complete this worksheet, these formulas must be retained.
- If you have claimed in B-1.8 and/or D-1.7 that the date of sale is one other than the invoice date, then provide the cost for the quarters that all domestic sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.

Answer:

Please refer to [Attachment G-3.1](#) for "G-3 Domestic CTM" spreadsheet.

1. Complete worksheet titled "G-3.2 domestic CTM source" listing the source of the data for each column of the worksheet "G-3 domestic CTM".

Answer:

Please refer to [Attachment G-3.2](#) for the data source for G-3 Domestic CTM.

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, including finance expenses, by account code for the most recent accounting period and the period.
 - Exclude any SG&A amount in respect of:
 - unrealised foreign exchange gains/loss
 - provision for doubtful debt
 - any other income/expense not directly/indirectly related to the manufacture or sale of the goods or like goods
 - The SG&A listing should reconcile to the trial balance and/or income statement.
 - 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.

Answer:

Please refer to [Attachment G-4.1](#) for "G-4.1 SG&A listing" worksheet.

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

Answer:

Please refer to [Attachment G-4.2](#) for “G-4.2 Domestic SG&A calculation” worksheet.

G-5 Cost to make the goods exported to Australia

The information is relevant to calculating the normal values based on costs. It is also relevant to calculating certain adjustments to the normal value.

1. Prepare this information in the “G-5 Australian CTMS” spreadsheet in the “Exporter Questionnaire – Attachment” Excel workbook.

| Title of wind farm project | Project X | Project X |
|---|-----------|-----------|
| Customer name | | |
| Contract number | | |
| Contract date | | |
| Invoice number | | |
| Invoice date | | |
| Item (e.g. complete tower, embed) | | |
| Model specification / product code | | |
| Quantity | | |
| Delivery date (actual or scheduled) | | |
| Variable manufacturing costs | | |
| Material – steel plate (for towers) | | |
| Material – flanges and flange bolts (for towers) | | |
| Material – steel plate (for embeds / foundation) | | |
| Material – flanges and flange bolts (for embeds / foundation) | | |
| Material – mechanical and electrical internal components | | |
| Material – lifts (where applicable) | | |
| Material – door frames, ladders (where applicable) | | |
| Material – paint | | |
| Material – packaging | | |
| Direct labour – manufacturing / production / packaging | | |
| Direct labour – testing, non-destructive testing (NDT) and QA | | |
| Other costs | | |
| Fixed manufacturing costs | | |
| Overheads | | |
| Depreciation | | |
| Finance charges | | |
| Other costs | | |

| | | |
|------------------------------------|--|--|
| Total cost to make | | |
| Selling costs | | |
| Administration and general costs | | |
| Financial costs | | |
| Delivery expenses | | |
| Other costs | | |
| Total cost to sell | | |
| Total cost to make and sell | | |
| Unit cost to make and sell | | |

Provide this information for all goods invoiced during the investigation period and for all goods the subject of a contract that was entered into during the investigation period, but invoiced or delivered outside of the investigation period. Where actual costs are not yet incurred, provide an estimate of these costs, for example, the estimate of the costs that formed the basis of your winning tender bid.

Provide this information for each unique unit of the goods contracted for sale or invoiced during the investigation period. For example, if one contract specifies production of two different types of the goods, provide this information for each type of the goods.

Provide the information broken down into fixed and variable costs, and indicate the % total cost represented by fixed costs.

If you are unable to supply this information in this format, please contact the case manager for this investigation.

Please specify unit of currency.

- The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold) for each good.
- If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the goods, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
- You must provide this list in electronic format using the template provided.
- If you have used formulas to complete this worksheet, these formulas must be retained.
- If you have claimed in B-1.8 that the date of sale is one other than the invoice date, then provide the cost for the quarters that all Australian sales are made within your claimed date of sale, even if doing so means that such cost data predates the commencement of the period.

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

1. Complete worksheet titled "G-5.2 Australian CTM source" listing the source of the data for each column of worksheet "G-5 Australian CTM".

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

2. Where there are cost differences between goods sold to the domestic market and those sold for export, give reasons and supporting evidence for these differences.

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

3. Give details and an explanation of any significant differences between the costs shown, and the costs as normally determined in accordance with your general accounting system. Reference should be made to any differences arising from movements in inventory levels and variances arising under standard costing methods.

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review. In addition, the Respondent is not based on standard costing methods.

4. In calculating the unit cost to make and sell, provide an explanation if the allocation method used (e.g. number, or weight etc.) to determine the unit cost differs from the prior practice of your company.

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

G-6 Cost allocation method

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

Answer:

For raw materials, [Sensitive].

For labour, [Sensitive].

For manufacturing overheads, [Sensitive].

[Sensitive information regarding the allocation methods for costs]

2. Select the domestic model (export model if you have no domestic production of like goods) with the largest production volume over the period and provide worksheets demonstrating the allocation method described in G-6.1 from your normal cost accounting system to the cost for that model reported in G-3.1.

Answer:

The cost accounting is done for each project automatically by the system. Please refer to [Attachment G-6.2](#) for the screenshot showing the manufacturing cost of one sample project.

G-7 Major raw material costs

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

Answer:

The major raw materials used in the manufacture of the goods are [Sensitive].

[Sensitive information regarding major raw materials used in the manufacture of the goods]

2. Are any raw materials sourced as part of an integrated production process or from a subsidiary company which your company exercise control? If yes, complete the worksheet named "G-7.2 Raw material CTM" for these raw materials.
 - The costs must be based on actual cost of production (i.e. not standard costs or cost of goods sold).
 - If any imputation tax (e.g. value-added tax) is payable on the purchase of goods or services to manufacture the raw material, report the costs excluding the imputation tax. All other taxes payable (e.g. import duty) must be included as 'other costs' if not already included, for example, under material costs.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.

Answer:

Not applicable. No raw material is sourced as part of an integrated production process or from a subsidiary company which the Respondent exercise control.

3. Using the domestic cost data in "G-3 Domestic CTM" (use "G-5 Australian CTM" if you have no domestic production of like goods), calculate the weighted average percentage of each raw material cost (listed in G-7.1) as a proportion of total cost to make.

Answer:

Please refer to [Attachment G-7.3](#) for the weighted average percentage of each raw material cost as a proportion of total cost to make.

4. For each raw material identified in G-7.3 which individually account for 10% or more of the total cost to make, complete the worksheets named "G-7.4 Plate steel purchases" and "G-7.4 Flange steel purchases"
 - This worksheet lists all raw material purchases (i.e. transaction by transaction) purchased by your company within the period. For these major inputs:
 - identify materials sourced in-house and from associated entities;
 - identify the supplier; and
 - show the basis of valuing the major materials in the costs of production you have shown for the goods (e.g. market prices, transfer prices, or actual cost of production).
 - The exporter questionnaire spreadsheet identifies plate steel and flanges as being examples of such costs. However, if there are further costs which individually account for 10% or more of the total

production cost please detail these in the same manner.

- 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.
- Are any of the suppliers in “G-7.4 Plate steel purchases”/” G-7.4 Flange steel purchases” listings related to your company? If yes, please provide details on how the price is set.

Where the major input is produced by an associate of your company, the Commission will compare your purchase price to a normal market price. If the associate provides information on the cost of production for that input, such cost data may also be considered.

Normal market price is taken to be the price normally available in the market (having regard to market size, whether the input is normally purchased at ‘spot prices’ or under long term contracts etc.).

The term ‘associate’ is defined in section 269TAA of the *Customs Act*. Included in that definition are companies controlled by the same parent company (a company that controls 5% or more of the shares of another is taken to be an associated company); companies controlled by the other company; and companies having the same person in the board of directors.

Answer:

Please refer to [Attachment G-7.4](#) for “G-7.4 Plate steel purchases” and “G-7.4 Flange steel purchases” worksheets.

[Sensitive]

[Sensitive information regarding the basis of valuing the major materials in the costs of production.]

One of the suppliers is related to the Respondent, which is [Sensitive]. The price is set based on [Sensitive].

[Sensitive information regarding the name of the related supplier and how the price is set.]

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

Answer:

Please refer to [Attachment G-7.5](#) for the list of data source of the “G-7.4 Raw material purchases”.

6. For each raw material:
 - (a) Select the two largest invoices by value and provide the commercial invoice and proof of payment.

Answer:

Please refer to [Attachment G-7.6\(a\)](#) for the documents related to raw material purchase.

- (b) Reconcile the total value listed in “G-7.4 Plate steel purchases”/” G-7.4 Flange steel purchases” listing to relevant purchase ledgers or trial balances in your accounting system. Provide copies of all documents used to demonstrate the reconciliation.

Answer:

Please refer to [Attachment G-7.6 \(b\)](#) for the documents related to reconcile the total value listed in “G-7.4 Plate steel purchases”/” G-7.4 Flange steel purchases”.

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.

Answer:

Please refer to [Attachment G-8.1](#) for “G-8 Upwards costs” worksheet.

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.

Answer:

Please refer to [Attachment G-8.2](#) for the supporting documents for “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; and
 - provide the account number and sub-account number (if applicable) at column E of the worksheet.

Answer:

Please refer to [Attachment G-8.1](#) for “G-8 Upwards costs” worksheet.

G-9 Production of the goods under consideration

1. Describe your company’s practices for capturing the production quantities reported at worksheets “G-3 domestic CTM” and “G-5 Australian CTM”. Consider using a flowchart in answering this question.

Answer:

Please refer to [Attachment G-9.1](#) for the flowchart describing the Respondent's practices for capturing the production quantities.

2. Outline the types of source documents kept by the company in relation to production quantities and how the production quantities are entered into the accounting system. Consider using a flowchart in answering this question.

Answer:

The production quantities are entered into the system [Sensitive].

[Sensitive information regarding how the production quantities is entered into the accounting system.]

Please refer to [Attachment G-9.2](#) for the flowchart how the production quantities are entered into the accounting system.

3. Briefly explain the reasons for any differences between:
 - (c) the production quantities reported at worksheet "G-3 domestic CTM" and the sales volumes reported at worksheet "D-2 domestic sales"; and

Answer:

Not applicable. The production quantities reported at worksheet "G-3 domestic CTM" and the sales volumes reported at worksheet "D-2 domestic sales" are the same.

- (d) the production quantities reported at worksheet "G-5 Australian CTM" and the sales volumes reported at worksheet "B-2 Australian sales".

Answer:

Not applicable. The Respondent did not export the goods to Australia during the period of review.

4. Describe how your company determines its volume of production for the goods, product mix of production and the factors that contribute to these decisions. How frequently are production volumes determined for the goods? How frequently is the product mix determined for the goods?

Answer:

The Respondent determine its volumes of production for the goods, product mix of production and the factors that contribute to these decisions based on each order.

5. What lead times are typically needed to adjust volumes of production for the goods?

Answer:

The Respondents can adjust volumes of production for the goods within [Sensitive] after accepting an order.

[Sensitive information regarding the lead time needed to adjust volumes of production for the goods].

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; after sales services; 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.

Goods under consideration (the goods)

The goods to which the application for anti-dumping action relates. That is, the goods that you have exported to Australia allegedly at dumped prices.

Incoterms

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

| | |
|-----|--|
| EXW | ex works (the seller's minimum obligation as costs relate to goods being made available at the sellers premises) |
| FCA | free carrier (main carriage not paid by seller. Pay costs until such time that the goods have been delivered at the named point into custody of a carrier named by the seller. Customs formalities, taxes etc. paid if required) |
| FAS | free alongside ship (main carriage not paid by seller. Deliver the goods alongside the ship) |
| FOB | free on board (main carriage not paid by seller. Deliver the goods on board, provide export clearance if required, pay loading costs to the point the goods have passed the ship's rail, pay customs formalities, taxes etc. payable upon exportation) |
| CFR | cost and freight (main carriage paid by seller. Pay all costs until delivered as well as freight, loading and unloading, pay customs formalities, taxes etc. payable upon exportation) |
| CIF | cost, insurance and freight (main carriage paid by seller. Pay all costs as under CFR as well as marine insurance) |
| 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 period

A period defined by the commission over which importations of the goods are examined.

Like goods

Like goods are goods sold on the domestic market of the country of export (or to a third country) that are identical in all respects to the goods or that, although not alike in all respects have characteristics closely resembling those of the goods. The term 'like goods' also refers to the goods produced by the Australian industry allegedly being injured by dumped imports.

Normal value

Australian legislation sets out several ways to assess "normal value".

The preferred method is to use the price paid for like goods sold for domestic consumption in the country of export. Usually, these sales are made by you, but there may be circumstances where it is appropriate to use sales made by other sellers on the domestic market.

Sale prices must be at arms length and in the ordinary course of trade. In the absence of relevant or suitable domestic sales, the normal value may be determined by constructing a price based on all costs to make and sell the goods, and an amount for profit. Alternatively the normal value may be ascertained using the price paid for like goods sold in the ordinary course of trade at arms length to customers in a country other than Australia, however this option is rarely used.

Finally, when a normal value cannot be ascertained by any of the above methods, or if no information is provided, the commission will determine the normal value by considering all the relevant information, including the applicant's information. This allows the applicant's information to be used where sufficient information has not been furnished or is not available.

Where domestic price generally, and the trade of the exporting country are determined or substantially influenced by the government of the exporting country, an alternative/surrogate market economy is selected by the commission and the normal value is determined as if the surrogate country were the export source.

Ordinary course of trade

Testing for "ordinary course of trade" includes a comparison of the selling price and the unit cost to make and sell for the same period. If sales in respect of a substantial quantity of goods over an extended period of time, usually 12 months, do not recover all costs and these losses are not likely to be recovered within a reasonable period of time, (again usually 12 months) then the sales are regarded as being not in the ordinary course of trade.

There may be circumstances where it is appropriate to use a period other than 12 months in assessing whether sales are in the ordinary course of trade.

Unprofitable sales are to be taken to have occurred in substantial quantities during an extended period where the unprofitable sales amount to 20% or more of the total volume of sales of the goods by the exporter over the period. An extended period of time is usually taken to be a period not less than 12 months. Where unprofitable sales are rejected, normal value is based upon remaining profitable sales provided they occur in sufficient number. Where all sales have been made at a loss, or profitable sales are insufficient, the normal value may be constructed from costs to make and sell.

Selling, general and administration expenses (SG&A)

The selling, general and administration expenses includes all selling, distribution, general and administration expenses including finance costs that would be incurred if the goods were sold for domestic consumption in the country of export. The amounts are determined in each case using all the available information and may include expenses incurred in:

- . domestic sales of like goods;
- . sale of goods of the same general category by the exporter; or
- . sales in the industry in the country of export.

The expenses must, however, reflect the selling, general and administration costs of the goods. Administrative and selling expenses include: director's fees, management salaries and benefits, office salaries and benefits, office supplies, insurance, promotion, entertainment, depreciation and corporate overheads.