Australian Government
Department of Industry, Science, Energy and Resources

Anti-Dumping Commission

Australian Industry Questionnaire

Product: 2,4-Dichlorophenoxyacetic Acid
From: The People's Republic of China (China)

Inquiry Period: 1 April 2021 to 31 March 2022

Response due by: 20 May 2022

Important note: The timeliness of your response is important. Please refer below for more information.

Case manager: Ben Merlin

Phone: 03 8539 2408

Fax: 03 8539 2499

E-mail: investigations1@adcommission.gov.au

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

Return completed questionnaire to: investigations1@adcommission.gov.au

OR

Anti-Dumping Commission
GPO 2013
Canberra ACT 2601
Australia

DECLARATION

I believe that the information contained in this response is complete and correct.

Signature:	
Name:	Brett Sutherland
Position:	Regional Manager APAC
Company:	Nufarm Limited
ABN:	37 091 323 312
Date:	04/07/2022

A-1 Identity and communication.

Please nominate a person in your company for contact about the response:

Contact Name:	Mr David Rumbold
Company and position:	Australia Portfolio Solutions Lead, Nufarm Australia Limited
Address:	103-105 Pipe Road Laverton North Victoria 3026
Telephone:	(03) 9282 1141
Facsimile:	N/A
E-mail address:	david.rumbold@nufarm.com
ABN:	80 004 377 780

Alternative contact

Name:	Nerida Mossop
Position in company:	APAC Chief Financial Officer
Address:	103-105 Pipe Road Laverton North Victoria 3026
Telephone:	0437 361 433
Facsimile:	N/A
E-mail address:	nerida.mossop@nufarm.com

If you have appointed a representative to assist with your response, provide the following details and complete Appendix A8 (Representation).

N/A

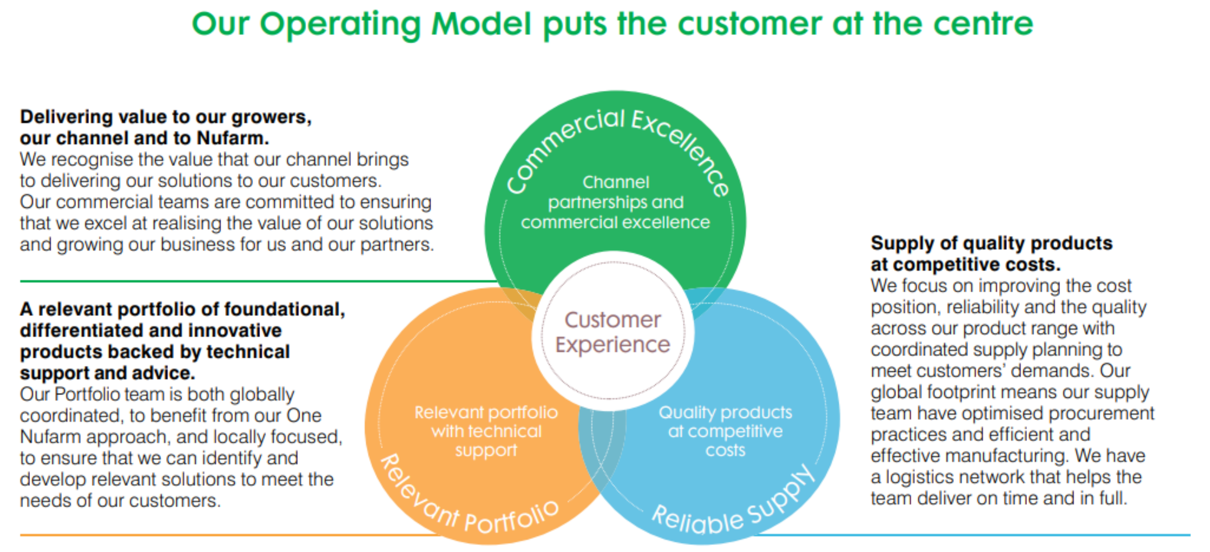
A-2 Company information.

1. *State the legal name of your business and its type (e.g. company, partnership, sole trader, joint venture). Please provide details of any other business names you use to manufacture/produce/sell the goods that are the subject of the investigation.*

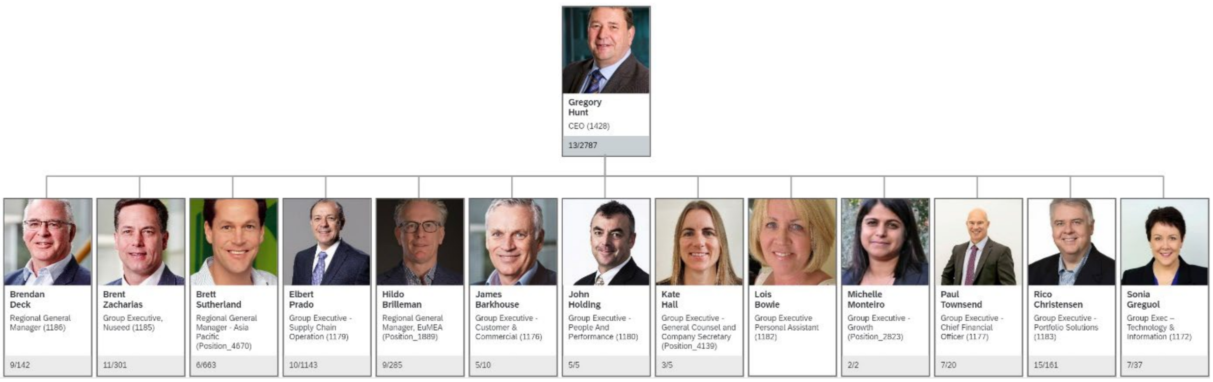
Nufarm Limited (ASX listed company) - 37 091 323 312
Nufarm Australia Limited (wholly owned subsidiary of Nufarm Limited for operations in Australia) - 80 004 377 780

2. *Provide your company's internal organisation chart. Describe the functions performed by each group within the organisation.*

Our operating model provides a good overview of the roles within the different groups in Nufarm Limited.



Nufarm Limited's global structure (Executive Management - Nufarm):



In the APAC structure (reporting to Mr Brett Sutherland), the three core functions for Nufarm Australia Limited are led by:

- Commercial: Mr Peter O'Keeffe
- Supply Chain: Mr Gordon Barrett
- Portfolio Solutions: Mr Tiago Muniz

3. *List the major shareholders of your company. Provide the shareholding percentages for joint owners and/or major shareholders.*

Beneficial holders as at 1 June 2022 with holdings over 5%:

Allan Gray Investment Mgt (Sydney)	35,290,555	9.29%
Vinva Investment Mgt (Sydney)	19,829,036	5.22%
Aware Super (Sydney)	19,674,513	5.18%

4. *If your company is a subsidiary of another company list the major shareholders of that company.*

N/A

5. *If your parent company is a subsidiary of another company, list the major shareholders of that company.*

N/A

6. *Provide an outline diagram showing major associated or affiliated companies and your company's place within that structure (include the ABNs of each company).*

7. *Are any management fees/corporate allocations charged to your company by your parent or related company?*

No.

8. *Identify and provide details of any relationship you have with an exporter to Australia or Australian importer of the goods.*

9. *Provide a copy of all annual reports applicable to the data supplied in appendix A3 (Sales Turnover). Any relevant brochures or pamphlets on your business activities should also be supplied.*

2022 Half Year Report: https://cdn.nufarm.com/wp-content/uploads/2022/05/19090327/2022-0519-HY-report-18.05.22.pdf
2021 Annual Report: https://cdn.nufarm.com/wp-content/uploads/2020/11/17074609/Nufarm-Annual-Report-2021_Web.pdf
2020 Annual Report: https://cdn.nufarm.com/wp-content/uploads/2020/11/19064818/Nufarm-AR2020_Web.pdf
2019 Annual Report: https://cdn.nufarm.com/wp-content/uploads/2019/11/01072841/Final-Web-Version-Annual-Report.pdf
2018 Annual Report: https://cdn.nufarm.com/wp-content/uploads/2018/10/26080248/Nufarm-Annual-Report-2018-LR.pdf

10. *Provide details of any relevant industry association.*

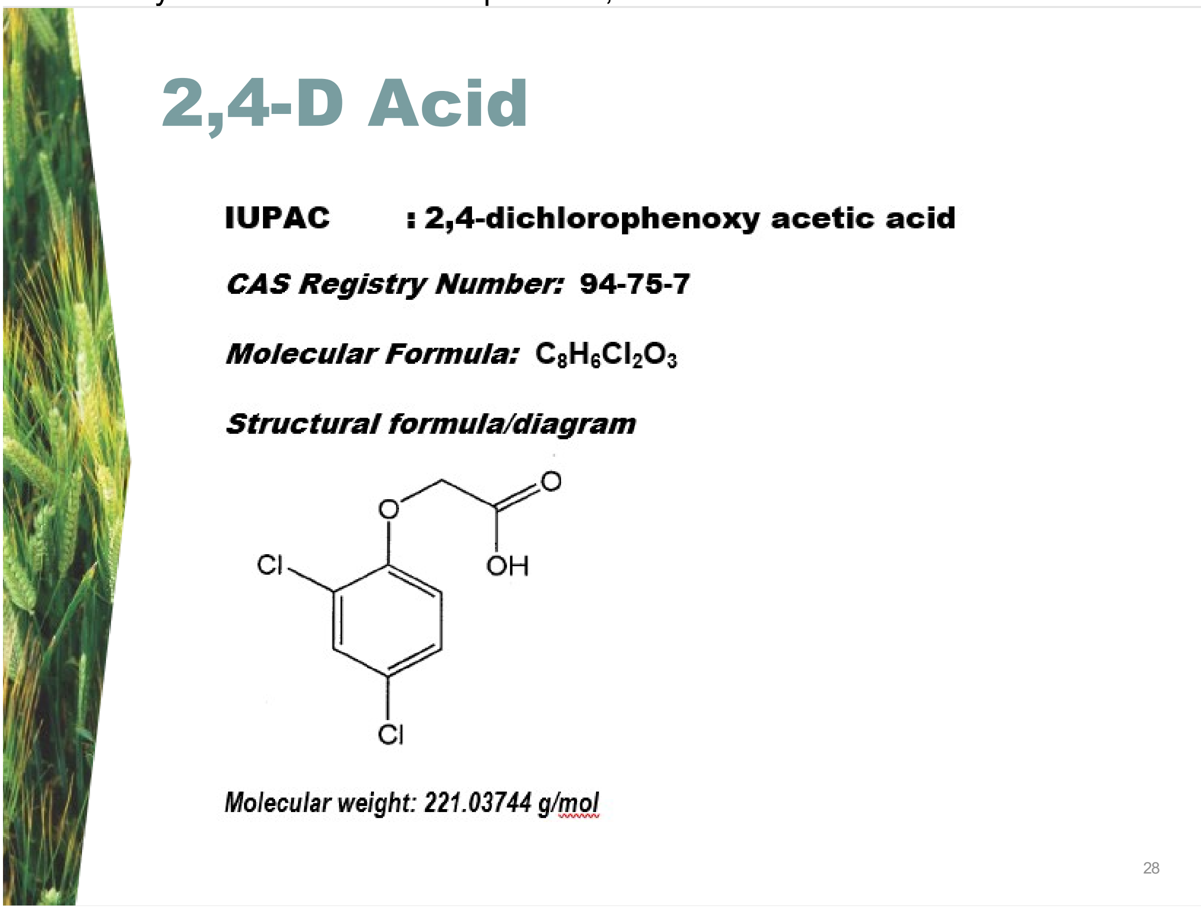
CropLife Australia: CropLife Australia

Chemistry Australia: Chemistry Australia

A-3 The imported and locally produced goods.

1. *Fully describe your product(s) that are 'like' to the imported product:*
    - *Include physical, technical or other properties.*
    - *List this information for each make and model in the range.*
    - *Supply technical documentation where appropriate.*
    - *Indicate which of your product types or models are comparable to each of the imported product types or models. If appropriate, the comparison can be done in a table.*

2,4-D Acid is the active herbicidal ingredient in the like goods and is synthesised in Australia by Nufarm at 103-105 Pipe Road, Laverton North VIC 3026.

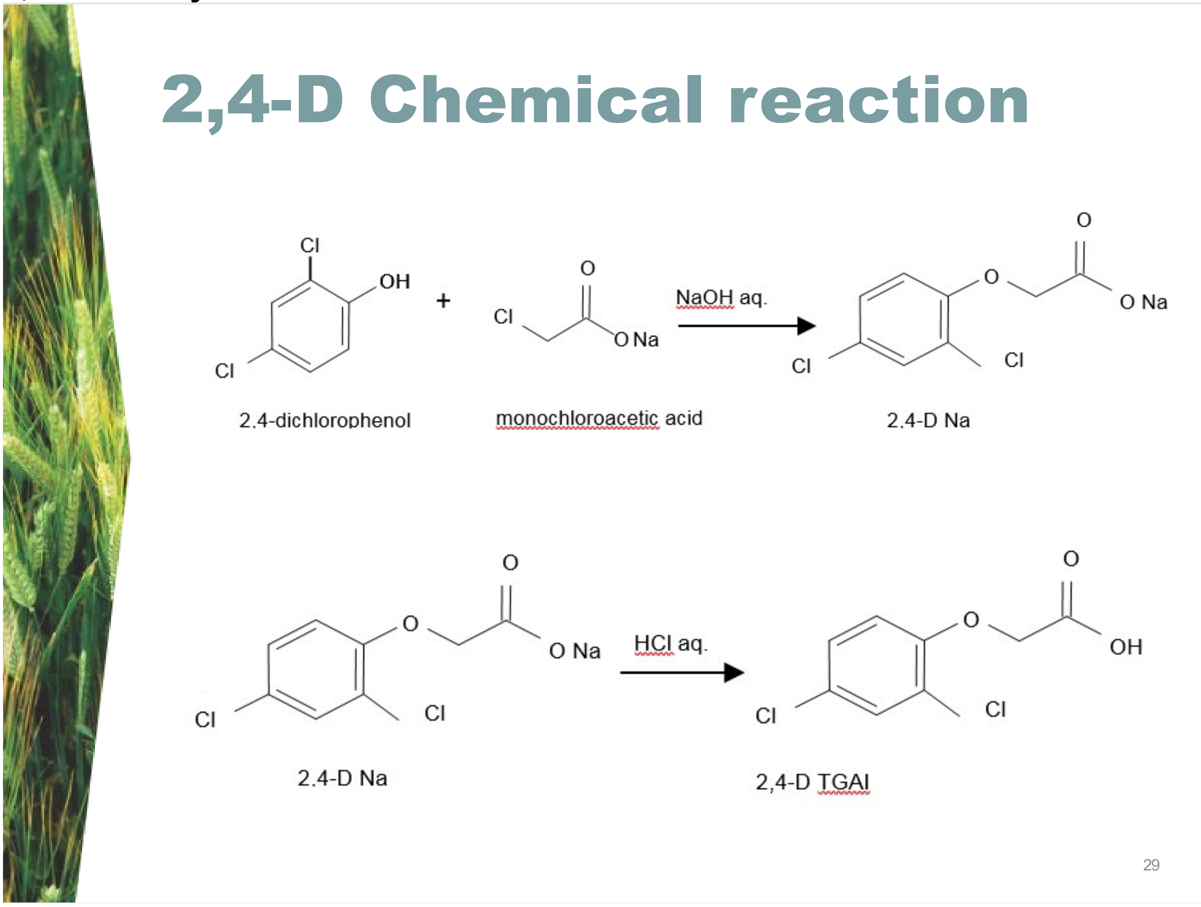


Neither 2,4-D Acid or its esters are soluble in water so cannot be used by farmers to mix in a spray tank to control weeds without being formulated into an herbicide product.

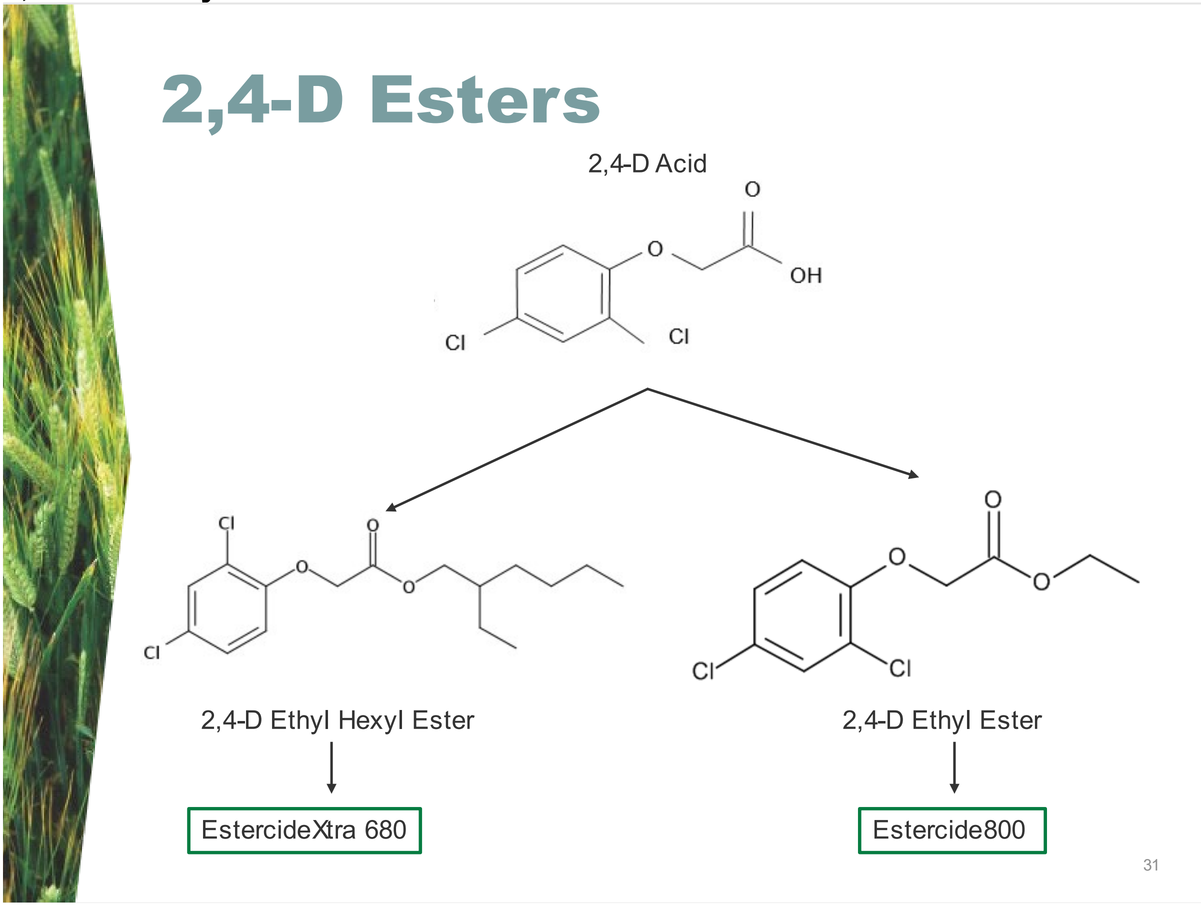
Dumped imports can either be technical material used by Australian formulators (either 2,4-D Acid itself or its esters) or formulated herbicide products containing these technical materials.

2. *Provide a summary and a diagram of your production process.*

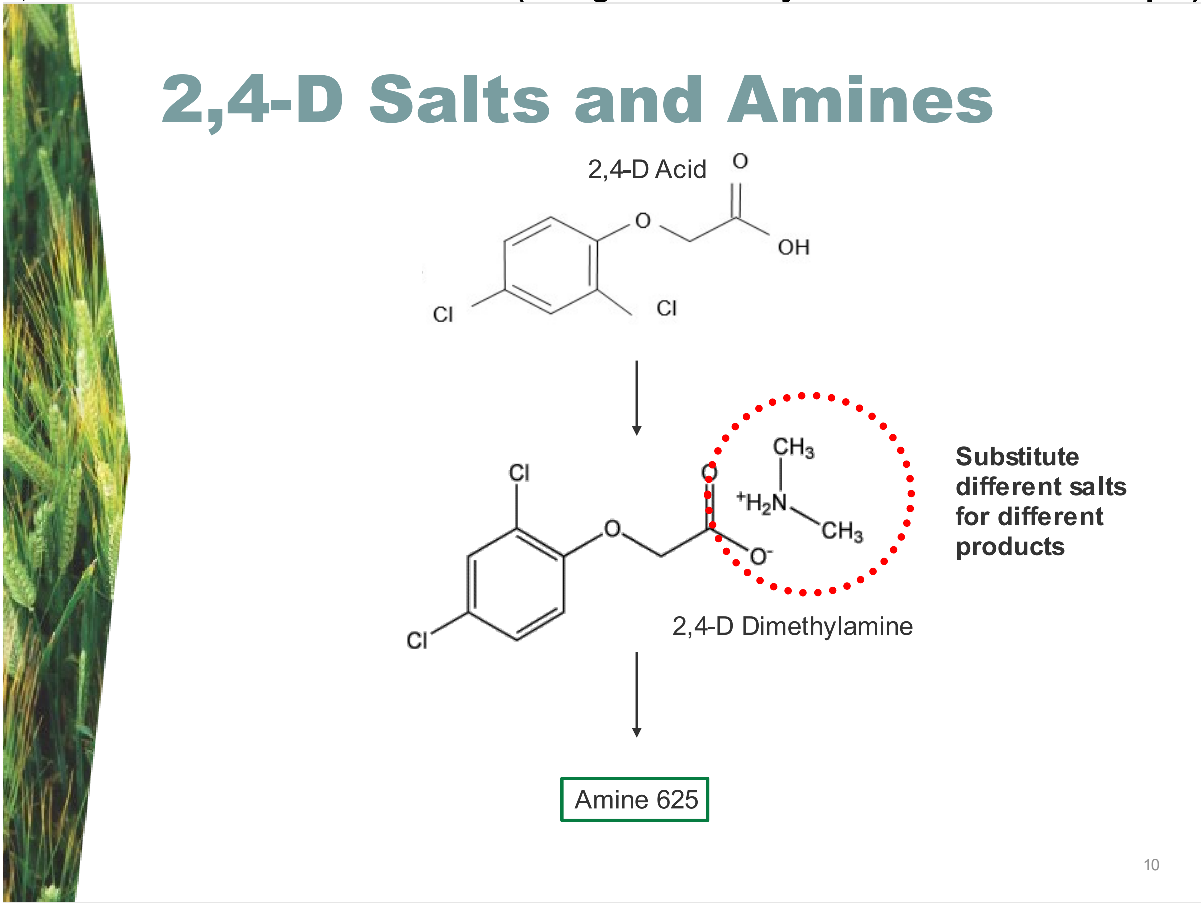
2,4-D Acid Synthesis:



2,4-D Ester Synthesis:



2,4-D Salt and Amine formulation (using the dimethylamine salt as an example):



3. *If your product is manufactured from both Australian and imported inputs:*
   - *describe the use of the imported inputs; and*
   - *identify that at least one substantial process of manufacture occurs in Australia (for example by reference to the value added, complexity of process, or investment in capital).*

Nufarm imports phenol which is then reacted with chlorine (which is produced on site through an electrolysis process requiring significant energy which passes through a brine solution prepared with locally mined sodium chloride) to form 2,4-dichlorophenol. A by-product of this chlorine production is sodium hydroxide which is reacted with 2,4-dichlorophenol and imported monochloroacetic acid to form a 2,4-D sodium salt which is then converted to 2,4-D acid via acidification with hydrochloric acid (which is also a by-product of the electrolysis process).

A-4 The Australian market.

1. *Describe the end uses of both your product and the imported goods.*

Technical forms of 2,4-D Acid (either the Acid itself or its esters) are used by formulators in Australia to prepare formulated herbicide products which are used by farmers to control broadleaf weeds.

Formulated herbicide products containing 2,4-D generally don't include another herbicidally active ingredients, but a small market exists for some mixture formulations which typically also contain the herbicide picloram.

2. Generally describe the Australian market for the Australian and imported product and the conditions of competition within the overall market. Your description could include information about:

- *sources of product demand;*
- *marketing and distribution arrangements;*
- *typical customers/users/consumers of the product;*
- *the presence of market segmentation, such as geographic or product segmentation;*
- *causes of demand variability, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production;*
- *the way in which the imported and Australian product compete; and*
- *any other factors influencing the market.*

2,4-D herbicides are used by Australian broadacre farmers to control broad leaf weeds. Approximately 90% of the annual volume in a typical year is applied in the 'fallow' phase of broadacre crops such as cereals, oilseeds and pulses. The purpose of use in this phase is to control weeds between harvest and planting the next season's crop so that the weeds do not consume valuable soil moisture and nutrients. Weeds in this phase will only typically germinate after significant rainfall events, so as a result it is a very volatile market with significant drops in demand during periods of drought (and corresponding spikes when widespread rain events occur). The volatility of this is seen in both the volume and return data in the confidential appendices for the periods of the inquiry in drought (1 April 2018 – 31 March 2020, noting the drought broke in Jan 2020) and not in drought (1 April 2020 – 31 March 2022).

The remaining 10% is used in-crop during cereal or pasture cropping rotations as they do not adversely affect these grass species but still control broadleaf weeds.

Farmers typically purchase their 2,4-D herbicides from local farm merchandise retailers such as Nutrien, Elders, AgLink and Delta and other select independent retailers.

2,4-D herbicide segmentation is typically:

- Ester formulations
  - Predominately 680 g/L 2,4-D ethyl hexyl ester formulations with a smaller share of 800 g/L 2,4-D ethyl formulations.
  - Most popular in Western Australia
  - Dumped imports compete directly with Nufarm on a price and volume basis
- Amine formulations
  - Led by Nufarm's patented Amicide Advance 700 formulation (700 g/L 2,4-D dimethylamine/monomethylamine salt) along with various 625 g/L and 720 g/L options
  - Most popular in Eastern Australia
  - Dumped imports typically compete indirectly with Nufarm as they cannot

supply an exact equivalent formulation to Amicide Advance 700 so undercut its price with either alternative amine formulations or ester formulations.

- Mixture formulations
    - A small volume comparative to the ester or amine formulations which is predominately a mixture of 2,4-D and picloram used in Sugarcane production
    - Due to the small size of the market, imports are not considered significant in this segment.

3. *Identify if there are any commercially significant market substitutes for the Australian and imported product.*

Generally, 2,4-D products can be substituted with a range of other broadleaf herbicides but these come with an increased cost so the decision to substitute is based on reasons other than price (such as resistance management, weed spectrum, weed growth stage, neighbouring sensitive crops, etc.)

4. *Complete appendix A1 (Australian production).*

Please see attached

5. Complete appendix A2 (Australian market).

Please see attached

A-5 Company sales.

1. *Complete appendix A3 (sales turnover).*

Please see attached

2. *Complete appendix A4 (domestic sales).*

- *If any of the customers listed at appendix A4 (domestic sales) are associated with your business, provide details of the association. Describe the price effect of the association.*

The only associations are through trading agreements (refer to Confidential Appendix NAL-1), none are subsidiaries of Nufarm Limited.

3. *Complete appendix A5 (sales of other production) if you have made any:*
   - *internal transfers; or*
   - *domestic sales of like goods that you have not produced, for example if you have imported the product or on-sold purchases from another Australian manufacturer.*

Please see attached (only associations are through trading agreements, none are subsidiaries of Nufarm Limited)

4. *Attach a copy of distributor or agency agreements/contracts.*

Refer to Confidential Appendix NAL-1

5. *Provide copies of any price lists.*

Refer to Confidential Appendix NAL-2

6. *If any price reductions (for example commissions, discounts, rebates, allowances and credit notes) have been made on your Australian sales of like goods provide a description and explain the terms and conditions that must be met by the customer to qualify.*
   - *Where the reduction is not identified on the sales invoice, explain how you calculated the amounts shown in appendix A4 (domestic sales).*
   - *If you have issued credit notes (directly or indirectly) provide details if the credited amount has* ***not*** *been reported appendix A4 (domestic sales) as a discount or rebate.*

Please see attached in the underlying data for the CTMS worksheets.

7. *Select two domestic sales in each quarter of the data supplied in appendix A4 (domestic sales). Provide a complete set of commercial documentation for these sales. Include, for example, purchase order, order acceptance, commercial invoice, discounts or rebates applicable, credit/debit notes, long or short term contract of sale, inland freight contract, and bank documentation showing proof of payment.*

Refer to Confidential Appendix NAL-3

A-6 General accounting/administration information.

1. *Specify your accounting period.*

Nufarm have recently changed its financial year to 1 Oct – 30 Sept. As a result, the periods for the enquiry span several different accounting periods (refer to annual reports linked above):

- 1 Aug 2017 – 31 July 2018
- 1 Aug 2018 – 31 July 2019
- 1 Aug 2019 – 31 July 2020
- 1 Aug 2020 – 30 Sept 2020 ("stub period")
- 1 Oct 2020 – 30 Sept 2021
- 1 Oct 2021 – 31 March 2022 (H1 for 1 Oct 2021 – 30 Sept 2022 financial year)

2. *Provide details of the address(es) where your financial records are held.*

103-105 Pipe Road, Laverton North VIC 3026

3. *Please provide the following financial documents for the two most recently completed financial years plus any subsequent statements:*

   - *chart of accounts;*

Refer to Confidential Appendix NAL-4.

   - *audited consolidated and unconsolidated financial statements (including all footnotes and the auditor's opinion);*

- 2022 Half Year Report: https://cdn.nufarm.com/wp-content/uploads/2022/05/19090327/2022-0519-HY-report-18.05.22.pdf
- 2021 Annual Report: https://cdn.nufarm.com/wp-content/uploads/2020/11/17074609/Nufarm-Annual-Report-2021_Web.pdf
- 2020 Annual Report: https://cdn.nufarm.com/wp-content/uploads/2020/11/19064818/Nufarm-AR2020_Web.pdf

   - *internal financial statements, income statements (profit and loss reports), or management accounts, that are prepared and maintained in the normal course of business for the goods.*

     These documents should relate to:

     1. *the division or section/s of your business responsible for the production and sale of the goods covered by the investigation, and*
     2. *the company overall.*

Refer to Confidential Appendix NAL-5. Note that Nufarm do not regularly break these details down to a product code level in the normal course of business, so the attachment provided represents a report from our system ("Business Objects") which was run on 21 June 2022.

4. *If your accounts are **not** audited, provide the unaudited financial statements for the two most recently completed financial years, together with your taxation returns. Any subsequent monthly, quarterly or half yearly statements should also be provided.*

N/A

5. *If your accounting practices, or aspects of your practices, differ from Australian generally accepted accounting principles, provide details.*

N/A

6. *Describe your accounting methodology, where applicable, for:*

- *The recognition/timing of income, and the impact of discounts, rebates, sales returns warranty claims and intercompany transfers;*

Revenue from contracts with customers is recognised when control of the goods or services are transferred to the customer at an amount that reflects the consideration to which the group expects to be entitled in exchange for those goods or services. The group has generally concluded that it is the principal in its revenue arrangements, because it typically controls the goods or services before transferring them to the customer.

(i) Goods sold. Revenue from sale of goods is recognised at the point in time when control of the asset is transferred to the customer, generally on delivery of the goods. The group considers whether there are other promises in the contract that are separate performance obligations to which a portion of the transaction price needs to be allocated. In determining the transaction price for the sale of goods, the group considers the effects of variable consideration, the existence of significant financing components, non-cash consideration, and consideration payable to the customer (if any).

(ii) Variable consideration. If the consideration in a contract includes a variable amount, the group estimates the amount of consideration to which it will be entitled in exchange for transferring the goods to the customer. The variable consideration is estimated at contract inception and constrained until it is highly probable that a significant revenue reversal in the amount of cumulative revenue recognised will not occur when the associated uncertainty with the variable consideration is subsequently resolved. Some contracts for the sale of certain products provide customers with a right of return and volume rebates. The rights of return and volume rebates give rise to variable consideration.

Rights of return
Certain contracts provide a customer with a right to return the goods within a specified period. The group uses the expected value method, including applying any constraints, to determine variable consideration to which the group will be entitled. For goods that are expected to be returned, instead of revenue, the group recognises a refund liability. A right of return asset (and corresponding adjustment to cost of sales) is also recognised for the right to recover products from a customer.

Rebates and sales incentives
The group provides rebates and sales incentives to certain customers once thresholds specified

in the contract are met or exceeded. Rebates are offset against amounts payable by the customer. To estimate the variable consideration for the expected future rebates, the group applies the requirements on constraining estimates of variable consideration and recognises a refund liability for the expected future rebates.

(iii) End point royalties The group receives royalty revenue from growers for certain varieties of seed. Sales or usage based royalties are recognised as revenue at the later of when the sales or usage occurs and the performance obligation is satisfied, which would be when the harvest occurs and the royalty is paid.

(iv) Significant financing components The group may receive short-term advances from its customers. Using the practical expedient in AASB 15, the group does not adjust the promised amount of consideration for the effects of a significant financing component as it is expected, at contract inception, that the period between the transfer of the good and when the customer pays for that good will be one year or less.

- *provisions for bad or doubtful debts;*

In estimating the provision for bad and doubtful receivables the group measures the expected credit losses (ECLs) using key assumptions to determine a probability weighted basis including the geographical location's specific circumstances. Actual expenses in future periods may be different from the provisions established and any such differences would impact future earnings of the group

- *the accounting treatment of general expenses and/or interest and the extent to which these are allocated to the cost of goods;*

In the case of manufactured inventories and work in progress, cost includes an appropriate share of overheads based on normal operating capacity.
Interest costs are not allocated to cost of goods.

- *costing methods (e.g. by tonnes, units, revenue, activity, direct costs etc) and allocation of costs shared with other goods or processes;*

- *the method of valuation for inventories of raw material, work-in-process, and finished goods (e.g. FIFO, weighted average cost);*

Inventories are measured at the lower of cost and net realisable value. The cost of inventories is based on the first-in first-out principle and includes expenditure incurred in acquiring the inventories, production or conversion costs and other costs incurred in bringing them to their existing location and condition. In the case of manufactured inventories and work in progress, cost includes an appropriate share of overheads based on normal operating capacity. Net realisable value is the estimated selling price in the ordinary course of business, less the estimated costs of completion and selling expenses.

- *valuation methods for scrap, by-products, or joint products;*

An allocation of manufacturing costs is made to caustic soda, which partially re-consumed later in the 2,4-D manufacturing process. Hydrochloric acid does not have a cost allocated to it. This is also partially re-consumed late in the 2,4-D manufacturing process. Excess caustic soda and HCL is sold to external parties. Losses on the caustic soda are generally offset by profit on the HCL.

- *valuation methods for damaged or sub-standard goods generated at the various stages of production;*

This is rare, but if 2,4-D goods to not meet specification they would be valued at the cost of production.

- *valuation and revaluation of fixed assets;*

Items of property, plant and equipment are measured at cost less accumulated depreciation and impairment losses. Cost includes expenditure that is directly attributable to the acquisition of the asset. The cost of self-constructed assets includes the cost of materials and direct labour, any other costs directly attributable to bringing the asset to a working condition for its intended use, and the costs of dismantling and removing the items and restoring the site on which they are located, and capitalised borrowing costs. Purchased software that is integral to the functionality of the related equipment is capitalised as part of that equipment. When parts of an item of property, plant and equipment have different useful lives, they are accounted for as separate items (major components) of property, plant and equipment.

- *average useful life for each class of production equipment, the depreciation method and depreciation rate used for each;*

Assets are depreciated on a straight-line basis with reference to the depreciation rates shown below. Asset life and depreciation rate may vary from these rates in specific circumstances if application of the prescribed rate would result in asset being carried at an amount exceeding its future value to the organisation.

Asset Category	Asset Life (years)	Depreciation %
Land	infinite	Nil
Buildings	40	2.5%
Envirodrums	8	12.5%
Motor Vehicles	4	25%
Plant & Equipment	13.3	7.5%
Furniture & Fittings	10	10%
Office machines	3	33.3%
Staff Amenities	3	33.3%

- *treatment of foreign exchange gains and losses arising from transactions and from the translation of balance sheet items; and*

Derivatives are initially recognised at fair value on the date a derivative contract is entered into and are subsequently remeasured to their fair value at the end of each reporting period. The accounting for subsequent changes in fair value depends on whether the derivative is designated as a hedging instrument, and if so, the nature of the item being hedged. The full fair value of a hedging derivative is classified as a non-current asset or liability when the remaining maturity of the hedged item is more than 12 months; it is classified as a current asset or liability when the remaining maturity of the hedged item is less than 12 months. Trading derivatives are classified as a current asset or liability. The group designates certain derivatives as either: • hedges of the fair value of recognised assets or liabilities or a firm commitment (fair value hedges); • hedges of a particular risk associated with the cash flows of recognised assets and liabilities and highly probable forecast transactions (cash flow hedges); or • hedges of a net investment in a foreign operation (net investment hedges). The group documents at the inception of the hedging transaction the relationship between hedging instruments and hedged items, as well as its risk management objective and strategy for undertaking various hedge transactions. The documentation includes identification of the hedging instrument, the hedged item, the nature of the risk being hedged and how the group will assess whether the hedging relationship meets the hedge effectiveness requirements (including the analysis of sources of hedge ineffectiveness and how the hedge ratio is determined). A hedging relationship qualifies for hedge accounting if it meets all of the following effectiveness requirements: • There is an 'economic relationship' between the hedged item and the hedging instrument. • The effect of credit risk does not 'dominate the value changes' that result from that economic relationship. • The hedge ratio of the hedging relationship is the same as that resulting from the quantity of the hedged item that the group actually hedges and the quantity of the hedging instrument that the group actually uses to hedge that quantity of hedged item. Hedges that meet all the qualifying criteria for hedge accounting are accounted for, as described below:

Fair value hedge

Changes in the fair value of derivatives that are designated and qualify as fair value hedges are recorded in profit or loss, together with any changes in the fair value of the hedged asset or liability that are attributable to the hedged risk. The gain or loss relating to the effective portion of interest rate swaps hedging fixed rate borrowings is recognised in profit or loss within finance costs, together with changes in the fair value of the hedged fixed rate borrowings attributable to interest rate risk. The gain or loss relating to the ineffective portion is recognised in profit or loss within other income or other expenses. If the hedge no longer meets the criteria for hedge accounting, the adjustment to the carrying amount of a hedged item for which the effective interest method is used is amortised to profit or loss over the period to maturity using a recalculated effective interest rate.

Cash flow hedge

The effective portion of changes in the fair value of derivatives that are designated and qualify as cash flow hedges is recognised in other comprehensive income and accumulated in reserves in equity. The gain or loss relating to the ineffective portion is recognised immediately in profit or loss within other income or other expenses. Amounts accumulated in equity are reclassified to profit or loss in the periods when the hedged item affects profit or loss (for instance when the forecast sale that is hedged takes place). The gain or loss relating to the effective portion of interest rate swaps hedging variable rate borrowings is recognised in profit or loss within ‘finance costs’. The gain or loss relating to the effective portion of forward foreign exchange contracts hedging export sales is recognised in profit or loss within 'sales'. However, when the forecast transaction that is hedged results in the recognition of a non-financial asset (for example, inventory or fixed assets) the gains and losses previously deferred in equity are reclassified from equity and included in the initial measurement of the cost of the asset. The deferred amounts are ultimately recognised in profit or loss as cost of goods sold in the case of inventory, or as depreciation or impairment in the case of fixed assets. When a hedging instrument expires or is sold or terminated, or when a hedge no longer meets the criteria for hedge accounting, any cumulative gain or loss existing in equity at that time remains in equity and is recognised when the forecast transaction is ultimately recognised in profit or loss. When a forecast transaction is no longer expected to occur, the cumulative gain or loss that was reported in equity is immediately reclassified to profit or loss.

Net investment hedge

Hedges of net investments in foreign operations are accounted for similarly to cash flow hedges. Any gain or loss on the hedging instrument relating to the effective portion of the hedge is recognised in other comprehensive income and accumulated in reserves in equity. The gain or loss relating to the ineffective portion is recognised immediately in profit or loss within other income or other expenses. Gains and losses accumulated in equity are reclassified to profit or loss when the foreign operation is partially disposed of or sold. Derivatives that do not qualify or are not designated for hedge accounting Certain derivative instruments do not qualify or are not designated for hedge accounting. Changes in the fair value of any derivative instrument that does not qualify or is not designated for hedge accounting are recognised immediately in profit or loss.

- *restructuring costs, costs of plant closure, expenses for idle equipment and/or plant shut-downs.*

These costs are excluded from cost of goods.

7. *If the accounting methods used by your company have changed over the period covered by the investigation please provide an explanation of the changes, the date of change, and the reasons.*

Financial year end was changed from 31 July to 30 September in 2021 to better align with global competitors.

The group has also adopted new and revised Standards and Interpretations issues by the AASB that are relevant to our operations.

1. *Complete appendices A6.1 and A6.2 (cost to make and sell) for domestic and export sales.*

Please see attached

A-8 Upwards sales and costs reconciliation

1. Reconciliation templates for upwards sales and costs are available at appendices B1 and B2. Please complete where applicable.

These templates are not able to be completed as our financial reporting is at an APAC group level and does not sufficiently split out either Australia nor specific products.

A-9 Other Factors

1. Complete appendix A7 (other factors).

Please see attached

A-10 Injury Claims

1. *Please provide a statement setting out whether you support or oppose an investigation of the anti-dumping measures and your reasons for doing so. If you support an investigation of the anti-dumping measures, provide evidence addressing whether dumped or subsidised imports have caused, are causing and/or will cause material injury to the local industry producing like goods.*

Your response should consider:

1. *Information on market trends for the goods in question for the last three years, addressing in particular, in the absence of the measures, the:*
   i. *Effects on volume and value of imports and sources of imports*
   ii. *Effects on price*
   iii. *Effects on sales and market shares*
   iv. *Effects on key performance indicators such as:*
      a. *profits,*
      b. *price trends,*
      c. *investment, and;*
      d. *employment.*

2. *Information addressing the likelihood of material injury occurring to the Australian industry in the absence of the anti-dumping measures. Alternative sources of export supply that may arise following the potential imposition of dumping duty, or production capacity in the country concerned, may be relevant.*

3. *Discuss factors other than dumped imports that may have caused injury to the industry. This may be relevant to the investigation in that an industry weakened by other events may be more susceptible to injury from dumping.*

Responses should be made as accurately and as comprehensively as possible. Supporting evidence should be attached wherever possible. It will not be sufficient to simply assert that the measure should remain in force.

As the applicant for continuation of these measures, Nufarm support their continuation for the reasons outlined in our application for continuation.

APPENDICES (ALL CONFIDENTIAL)

Appendix A1	Australian Production
Appendix A2	Australian Market
Appendix A3	Sales Turnover
Appendix A4	Domestic Sales
Appendix A5	Sales of Other Production
Appendix A6.1	Cost to Make and Sell (& profit) Domestic Sales
Appendix A6.2	Cost to Make and Sell (& profit) Export Sales
Appendix 7	Other Factors
Appendix A8	Authority to Deal With Representative
Appendix B1	Upward Sales Reconciliation Template
Appendix B2	Upward Costs Reconciliation Template
Appendix NAL-1	Trading Agreements
Appendix NAL-2	Nufarm Price Lists
Appendix NAL-3	Selected Invoice Documentation
Appendix NAL-4	Chart of Accounts
Appendix NAL-5	FY20 to FY22 Sales Reports