



2

Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

Ref:2013-1129-0-9943
May 5, 2013

✓ Mr. Bilgehan Shasmaz
Chief Commercial Counselor
202, Hayarkon St.,
Tel Aviv 63405
Phone: +972 (3) 5240905
Fax: +972 (3) 5236198
E-mail: dttel@netvision.net.il

Dear Sir,

RE: Notification of Initiation of an Anti-Dumping Investigation Concerning Machine Made Rugs Imported from Turkey

1. Following my letter of Receipt of Anti-Dumping Complaint regarding the complaint submitted by Caesarea Carpets (97) Ltd., I wish to inform you that I have decided to initiate an Anti-Dumping investigation concerning the importation of Machine Made Rugs from Turkey.
2. The Anti-dumping proceedings are conducted according to Section C of the Israel's Trade Levies and Safeguards Measures Law, 5751-1991 (the "Law").
3. Please find attached:
 - (a) An executive summary of the complaint, prepared by the complainant (in English);
 - (b) The non-confidential version of the complaint (in Hebrew);
 - (c) The decision to initiate the investigation (in Hebrew);
 - (d) A questionnaire to which relevant manufacturers and exporters are requested to answer.

4. All interested parties are invited to submit information, evidence and their arguments and answer the questionnaire within 30 days from the day of notice.
5. The above documents have been sent to the manufacturers and exporters named within the complaint. If you so wish, you may forward the above documents to any additional interested parties in order to ensure that they have the opportunity to submit information, evidence and their arguments within the above time limit.



3

Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

6. Our findings, regarding whether there is dumping, consequent injury and the duty required, will be determined on the basis of best information available. It is therefore important that every interested party will submit information, evidence, their arguments and an answered questionnaire.
7. The determination whether provisional measures are required and the estimated rate of the anti-dumping duty (according to which the provisional duty is set) will not be made before the interested parties have had the opportunity, within the time constraints of the Law, to submit information, evidence, their arguments and an answered questionnaire, if they so wish. In any case, provisional measures shall not be applied sooner than 60 days after the initiation of the investigation.
8. If you require any further clarifications, kindly let us know. Otherwise, we will keep you informed of any further developments in this regard.

Sincerely,


Yair Shiran
Acting Commissioner

cc: Mr. Ohad Cohen, Director of Foreign Trade Administration, Ministry of Economy.
Ms. Rachel Hirshler, Director, International Agreements & Trade policy.
Ms. Natalie Gutman, Director, Bilateral Trade Agreements Division, Foreign Trade Administration.

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התחידה למסלול המס

Caesarea Carpets (97) Ltd.

Executive Summary

Caesarea Carpets (97) Ltd. (hereinafter - "the Company") filed a request before the Commissioner of Trade Levies ministry to exercise his authority and take anti dumping measures against imports of machine made rugs from Turkey (hereinafter - "the goods subject complaint").

Details on the company

The Company owns a plant producing machine-made rugs acting in Israel for over 50 years.

The company's products are marketed to customers in the domestic and international market as follows:

1. Local market - is divided into two segments:

1.1 Domestic market - the company's products in this market are mainly sold under the brand name "Carmel Carpets and flooring". The products are marketed all over the country in the following retail chain stores: Carmel Carpets and flooring, Betili and IDdesign and other leading retail chains such as Home Center and Shufersal.

1.2 Institutional market - the company specializes in the marketing and implementation of contracts of major compounds floor coverings, which usually requires contractual customers such as hotels and office buildings.

The company tailor makes the products and services to the customer requirements until the end of each project.

2. Global market - The Company markets its products to customers all over the world mainly to North America and Europe.

The company's plants and carpet stores are a source of livelihood to hundreds of families, including over 100 workers from the Israeli Arab sector in Israel.

The company's plants are ISO 9001 and ISO 14001 certified.

Identical products

As explained in the body of the complaint, the goods subject of the complaint and the product manufactured by the Company are identical in terms of the use, production processes, materials, marketing channels, customer reference, etc.

Manufactures of Identical products manufactured in Turkey
Details on the Turkish Exporters carpet manufacturers selling machine made rugs at dumping prices in Israel:

Dumping rates

Dumping rate is calculated based on bids of Turkish exporters who offer the goods, subject of the complaint, in the Turkish market at a higher price of 65% - 85% of the price offered for export for the same product.

Damage

As explained in detail in the body of the complaint, the damage is severe and is expressed in the following aspects:

1. Quantities - the volume of imported goods, subject of the complaint, from Turkey has increased along with a decrease in quantities sold by the domestic plant at the local market.

2. Prices - The Company sells the products to the local market at a 30% to 40% higher price than the same products imported from Turkey.

3. Damage to profitability - the decline in prices affects fair competition and requires the company to stop producing the rugs for the domestic market products that were previously profitable. Existing products sold to this market forced the company to cut prices or settle for smaller ordered quantities.

The company's plants are not operating at full capacity and will be able to produce large-scale quantities if dumping is limited.

Limitation of dumping will increase competition in the domestic market and will enable importers of machine made rugs manufactured by American and European manufacturers to enter the market along with production increase in the local market by the company. Import from Turkey will decrease but not stop, as there are many importers from the Arab and Palestinian Authority areas that prefer the Turkish goods over Israeli goods for political reasons (Israeli merchandise is not preferred in the PA) but will not come to Israel in such large quantities as today. .

Complainant's request

In the complaint, the company seeks from the supervisor:

1. Imposing a tax on imports of goods subject of the complaint to Israel in order to alleviate the damage caused to the Company as a result of dumping prices.

2. Instruct the Customs Administration to request a temporary guarantee when importing goods subject of the complaint to Israel.

CAESAREA CARPETS (97) LTD.



6

Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

Ref: 2013-1129-0-9949
May 5, 2013

PRODUCER/EXPORTER QUESTIONNAIRE

In accordance with Chapter C of the Israeli Trade Levies and Safeguard Measures Law, 1991

INVESTIGATING OFFICER: Mr. Alexander Tochilkin

ADDRESS: Trade Levies Unit
Foreign Trade Administration
Ministry of Economy
5 Bank Israel St., POB 3166
Jerusalem 91036
Israel

PHONE: +972-2-6662621/2 **FAX:** +972-2-6662939

E-Mail: Alexander.Tochilkin@Economy.gov.il

COMPLAINANT: Caesarea Carpets (97) Ltd.

PRODUCT UNDER INVESTIGATION: Machine made rugs

COUNTRY OF ORIGIN: Turkey

PERIODS OF INVESTIGATION:

Dumping: April 1, 2012 to March 31, 2013

Injury: January 1, 2010 to March 31, 2013



7

Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

TABLE OF CONTENTS

GENERAL INSTRUCTIONS	3
SECTION A: COMPANY STRUCTURE AND OPERATIONS	4
SECTION B: PRODUCTS UNDER INVESTIGATION	6
SECTION C: DOMESTIC SALES	8
SECTION D: EXPORT SALES	14
SECTION E: COSTS OF PRODUCTION	19
SECTION F: ISRAELI MARKET - MATERIAL INJURY	21



Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

GENERAL INSTRUCTIONS

The information requested hereunder is necessary for the authorities in order to understand your products, prices, costs and production processes. You are therefore requested to provide complete and detailed reply to each of the items listed below. Please note that the following questions are based on the fact that your company is the supplier as well as producer of the products. In case your company does not produce the products, the questionnaire should be answered by the producer as well.

Notice: Failure to submit all required information and documentation, including non-confidential versions, or failure to permit verification of any information, may result that the authority's findings be based on the best information available. Such a decision will be less favorable to your company than if full and verifiable information is made available.

1. Unless otherwise specified, replies should relate to the periods of investigation as noted above.
2. Information and supporting evidence may be given on a confidential basis, as explained in the cover letter.
3. In your reply, clearly refer to the specific question you are answering.
4. The questionnaire is not intended to be a "fill in" questionnaire except for the certification of accuracy, which should be returned with your reply.
5. If a question is not relevant to your situation, explain briefly why you have not responded. Address any areas not covered in the questionnaire that you believe should be addressed.
6. Identify any source documents maintained in the normal course of business you have relied on in preparing your response, and specify the locations where such documents are maintained. Please include this information in an Appendix to your response.
7. Your reply and all accompanying documents should be in English.
8. Please note that certain information in Sections B, C, D and E should be submitted on a compact disc or USB Flash Drive encoded in Word and / or Excel formats only.



9

Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

SECTION A: COMPANY STRUCTURE AND OPERATIONS

The information requested in this part will provide the Authority of Trade Levies with an overview of your corporate organization, the goods you may produce and/or sell, and your domestic and export markets. It will also facilitate planning, scheduling and conducting the verification meeting at your company.

Please provide the following information:

1. Legal name and form of your business (corporation, partnership, sole trader, etc.).
2. Owners and/or principal shareholders including details of shareholder's percentages of ownership.
3. Your company's complete mailing address, telephone, fax numbers, web site address and e-mail address.
4. The name and position of the person in your company responsible for your response to this Questionnaire including his/her telephone number, fax number and e-mail address.
5. A description of the company's structure. Provide a chart of your company's legal structure. In addition to the chart, provide a list of all companies affiliated with your company through stock ownership or otherwise. Describe also the activities of each affiliated company, with particular attention to those involved with the subject products. (Please include brochures or pamphlets on your company and business activities.)
6. Annual financial statements for the past three fiscal years. Please provide manufacturing and/or income statements of the Division or Section/s of your business, which is responsible for the production and sale of the product under investigation. If this is not possible, please



10

Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

provide the lowest financial breakdown for products that include the products under investigation.

7. A description of the range of products produced by your company.
8. No. of employees employed by your company.



SECTION B: PRODUCTS UNDER INVESTIGATION

1. Please provide the following details regarding each and every model/type of the products under investigation and like products manufactured by you. For any model/type indicate whether it is sold domestically and/or exported to Israel:
 - a. Name and code used in your books and sales records.
 - b. Detailed description of the product, including relevant technical and illustrative material.
 - c. Catalogues and price lists.
 - d. A detailed description/s of each stage of the production process: the material inputs needed, the equipment used and the processing time, the work involved: number of workers/hours.
 - e. The company's total production capacity and actual production.
If the products being sold domestically are not identical to those exported to Israel, please emphasize the difference.
2. Please provide the total volume of sales of the products under investigation. The preferred format for this information is shown in Table 1 below. Information should be supplied for the current year and the three previous years **quarterly**. Prepare a separate table for each different model/type



12

Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

TABLE 1: TOTAL SALES - DOMESTIC AND EXPORT DURING INJURY PERIOD OF INVESTIGATION

Model/type: _____; Catalog No.: _____; Year: _____

QUARTER	TOTAL SALES QUANTITY*				TOTAL VALUE**			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
DOMASTIC MARKET								
EXPORT TO ISRAEL								
EXPORT TO OTHER COUNTRIES								
TOTAL SALES								

* Square meters

** Specify unit of currency (and exchange rate if applicable)



SECTION C: DOMESTIC SALES

The information requested in this part is required to determine the normal values of the *subject goods*. Generally, where there are a sufficient number of profitable domestic sales of like goods to more than one unrelated customer, normal values are based on your firm's domestic selling prices of the like goods. Some factors which may be taken into account, and for which adjustments may be made, include the trade level of the importer to Israel compared to the trade level of your domestic customers, the quantities of goods sold to importers to Israel compared with the quantities of like goods sold to your domestic customers, qualitative differences, taxation differences and other differences in terms and conditions of sale. However, if there are insufficient or no domestic sales of like goods, if domestic sales of like goods are sold to only one customer or if domestic sales of like goods are non-profitable, normal values may be calculated based on your firm's total cost of the goods plus an amount for profit. Questions on your costs are found in Section E of this Questionnaire. The domestic sales of like goods that will be reviewed are those sales made in the Dumping Period of Investigation (DPI), from April 1, 2012 to March 31, 2013.

1. Please provide the following details of each and every model/types of the products under investigation manufactured by you and sold domestically to all customers in the Dumping Period of Investigation, in the format as appears in Tables 2 and 3 below. Notice that database in table 2 should provide a transaction-by-transaction listing of every shipment you made in the home market in a chronological order. Notice that information in table 3 should be supplied separately for each quarter of each year of the period of investigation. Information should be supplied separately for each model number.



Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

TABLE 2: DOMESTIC SALES DURING DUMPING PERIOD OF INVESTIGATION

Model/type: _____; Catalog No.: _____;

INVOICE NUMBER	DATE	CUSTOMER NAME	ASSOC. (Y/N)	LEVEL OF TRADE	MODEL/TYPE	CATALOG NO.	VALUE	QUANTITY
1	2	3	4	5	6	7	8	9

INLAND TRANSPORTATION	WAREHOUSING	HANDLING	TAXES	OTHER	WEIGHT BRUTTO	WEIGHT NETTO	DENSITY	PRODUCTION METHOD
10	11	12	13	14	15	16	17	18

RAW MATERIAL	THREAD TYPE	WEAVING TYPE	ACTUAL PRICE PER SQM	PRICE PER SQM ACCORDING TO PRICE LIST
19	20	21	22	23

Explanations:

Column 4: If the customer is associated with your business, indicate with the letter "Y". If not associated, use the letter "N". Provide a separate explanation of the association.

Column 5: For example, wholesale, distributor, end user (provide an explanation in price, if there are any).

Column 8: Specify unit of currency (and exchange rate if applicable).

Column 9: Square meters

Column 17: Specify weight per square meters

Information should be supplied separately for each model number.

The information should be supplied by the order of transactions.



15

Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

TABLE 3: DOMESTIC SALES DURING DUMPING PERIOD OF INVESTIGATION

Model/type: _____; Catalog No.: _____; Year: _____;
Quarter(1): _____

CUSTOMER NAME	ASSOC. (Y/N) (2)	LEVEL OF TRADE (3)	TOTAL SALES	
			VALUE (4)	QUANTITY (5)
TOTAL				

Explanations:

- 1 Provide this table separately for each quarter of each year for the period of investigation.
- 2 If the customer is associated with your business, indicate with letter "Y". If not associated, use letter "N". Provide a separate explanation of the association.
- 3 For example, wholesale, distributor, end user (provide an explanation in price, if there are any).
- 4 Specify unit of currency (and exchange rate if applicable).
- 5 Square meters

Please provide a compact disc or USB Flash Drive containing table 2 and 3. The data must be in Excel format only.

2. Please provide the following details:

- a. Price lists in effect at the period reported in the table, which appears in Table 2 below, as well as current price lists.
- b. If sales are not in accordance with price lists, please describe your domestic pricing policy.
- c. Details of any discounts given for cash, quantity, or goods supplied free of charge.



16

Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

- d. Please provide detailed information regarding any kind of Subsidy your company receives from the Turkish Government for sales on domestic market.
3. Please provide a detailed explanation of your company's channels of distribution to your domestic customers. Include a flow chart depicting the movement of the goods. Explain in detail any agency or distributor agreements and provide copies of each. At each step of the process, describe the functions or activities performed.
4. State whether the selling prices of the like goods sold in your domestic market vary depending on the channel of distribution through which you sell. If yes, explain how and why the prices vary.
5. Select a domestic customer that purchases at the same level of trade, and purchases a similar volume of like products as your Israeli customers. If you do not have such a customer, please select a domestic customer whose purchases are most comparable with purchases by your Israeli customers. Provide reasons for your selection.
6. Once the domestic customer has been selected, provide copies of sales invoices, details of discounts or rebates, commissions or royalties granted or any other consideration or re-imbursement made in respect of the selling price and evidence of payment. Please provide details of the contractual arrangements concerning the transactions. These documents should be selected for transactions in each quarter-year of the relevant period.
7. Indicate if the sales price is less than your total costs for any of the transactions you have provided.
8. For each domestic customer to whom your company sold the like goods during the DPI, provide a list with the following information:



- a. Full name of customer;
- b. Full address;
- c. Customer code;
- d. Relationship between your firm and this customer (associated or not);
- e. If known, indicate if the customer is associated to any other domestic customer;
- f. Trade level;
- g. Total quantity and value of all goods purchased (both subject and non-*subject goods*), for the last fiscal year and the current fiscal year-to-date; and indicate if the domestic customers is considered to be at the same trade level as your Israeli customer(s).

Adjustments to the Domestic Price:

9. To enable a fair comparison between the export price to Israel and the domestic price in your country, certain adjustments may be made. Indicate if there are any cost differences between your sales to the domestic customer you selected and the export sales in the following items and, if so, provide explanation and supporting documentation to assist in quantifying this difference:

- a. Packing
- b. Inland freight
- c. Insurance
- d. Storage
- e. Handling
- f. Credit (give days, interest rate, and cost)
- g. Taxes
- h. Sales incentives
- i. Commissions
- j. Warehousing/storage



19

Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

SECTION D: EXPORT SALES

This part of the Questionnaire requests information concerning your exports to Israel and other countries. This information is required to determine your export practices and the export price of those goods imported into Israel during the DPI.

1. For each of your customers in Israel that imported the *subject goods* during the DPI, provide the following:
 - a. Name;
 - b. Customer code;
 - c. Address;
 - d. Telephone number;
 - e. Fax number;
 - f. E-mail address;
 - g. Name of the contact person;
 - h. Trade level (distributor, wholesaler, end user, etc.);
 - i. Full list price (base book price plus applicable extras) for each product shipped.
2. List your sales of the products under investigation for each importer for the Dumping Period of Investigation in the format of Table 4 below. Information should be supplied separately for each model number.



Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

TABLE 4: EXPORT SALES DURING DUMPING PERIOD OF INVESTIGATION

DATE	INVOICE NUMBER	IMPORTER	ASSOC. (Y/N)	LEVEL OF TRADE	MODEL/TYPE	CATALOG NO	TERMS OF SALE
1	2	3	4	5	6	7	8

VALUE	QUANTITY	DOMESTIC INLAND FREIGHT	INLAND INSURANCE	STORAGE	OCEAN FREIGHT	OCEAN INSURANCE	HANDLING	EXPORT TAXE
9	10	11	12	13	14	15	16	17

OTHER TAXES	EXPORT INSPECTION FEES	CUSTOMS DUTIES	AGENT FEES	COMMISSIONS	LOADING IN COUNTRY OF EXPORT	UNLOADING IN ISRAEL	OTHER COSTS
18	19	20	21	22	23	24	25

WEIGHT BRUTTO	WEIGHT NETTO	DENSITY	PRODUCTION METHOD	RAW MATERIAL	THREAD TYPE	WEAVING TYPE	ACTUAL PRICE PER SQM	PER PRICE SQM ACCORDING TO PRICE LIST
26	27	28	29	30	31	32	33	34

Explanations:

Column 4: If the customer is associated with your business, indicate with the letter "Y". If not associated, use the letter "N". Provide a separate explanation of the association

Column 5: Example, wholesale, distributor, end user (provide an explanation in price, if there are any).

Column 8: Specify FOB, CIF, C&F etc.

Column 9: Specify unit of currency (and exchange rate if applicable).

Column 10: Square meters.

Column 28: Specify weight per square meters



Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

Please provide a compact disc or USB Flash Drive containing table 4. The data must be in Excel format only.

List your sales to other countries of the products under investigation for each importer for the Dumping Period of Investigation in the format of Table 4-1 below

TABLE 4-1: EXPORT SALES DURING DUMPING PERIOD OF INVESTIGATION TO OTHER COUNTRIES

COUNTRY NAME	DATE	INVOICE NUMBER	IMPORTER	ASSOC. (Y/N)	LEVEL OF TRADE	MODEL/TYPE	CATALOG NO	TERMS OF SALE
0	1	2	3	4	5	6	7	8

VALUE	QUANTITY	DOMESTIC INLAND FREIGHT	INLAND INSURANCE	STORAGE	OCEAN FREIGHT	OCEAN INSURANCE	HANDLING	EXPORT TAX
9	10	11	12	13	14	15	16	17

OTHER TAXES	EXPORT INSPECTION FEES	CUSTOMS DUTIES	AGENT FEES	COMMISSIONS	LOADING IN COUNTRY OF EXPORT	UNLOADING	OTHER COSTS
18	19	20	21	22	23	24	25

WEIGHT BRUTTO	WEIGHT NETTO	DENSITY	PRODUCTION METHOD	RAW MATERIAL	THREAD TYPE	WEAVING TYPE	ACTUAL PRICE PER SQM	PER PRICE SQM ACCORDING TO PRICE LIST
26	27	28	29	30	31	32	33	34

Explanations:

Column 4: If the customer is associated with your business, indicate with the letter "Y". If not associated, use the letter "N". Provide a separate explanation of the association



22

Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

Column 5: Example, wholesale, distributor, end user (provide an explanation in price, if there are any).

Column 8: Specify FOB, CIF, C&F etc.

Column 9: Specify unit of currency (and exchange rate if applicable).

Column 10: Square meters.

Column 28: Specify weight per square meters

Please provide a compact disc or USB Flash Drive containing table 4-1. The data must be in Excel format only.

3. Provide a detailed explanation of your company's channels of distribution to importers in Israel. Include a flow chart explaining the shipment of the goods from the manufacturing plant to the importer in Israel. Explain in detail any agency or distributor agreements and provide copies of each agreement. At each step of the process, describe the functions or activities performed by the respective parties.
4. Please provide detailed information regarding any kind of Subsidy your company receives from the Turkish Government for sales on export market.
5. Select a representative transaction in each quarter and provide copies of sale invoices, details of any discounts and rebates, bills of lading and evidence of payment.
6. For each customer provide the following details:
 - a. Any agreements, or contracts (supply copy) concerning the transactions (i.e. credit terms, advertising, warranty)
 - b. Any financial or other association your business has with the customer (other than vendor/buyer)
 - c. Discounts, rebates, commissions, royalties, or any other consideration or re-imbursement made in respect of the selling price



23

Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

7. Describe how your prices to each customer are determined. If sales are in accordance with price lists, supply copies of all lists that were applied during the period of investigation.
8. Please give details of any other matters which may affect the actual export price of the product under investigation.
9. For the product under investigation please provide the following costs incurred for each unit:
 - a. Export packing
 - b. Storage
 - c. Inland freight from factory to port (and please specify distance in kilometers)
 - d. Inland insurance
 - e. Ocean freight
 - f. Ocean insurance
 - g. Handling
 - h. Export taxes
 - i. Other taxes
 - j. Export inspection fees
 - k. Customs duties
 - l. Agent fees
 - m. Commissions
 - n. Loading in country of export
 - o. Unloading in Israel
 - p. Other costs

10. Terms of Payment:

Are your export sales on cash terms? If these sales are not on a cash basis, how do you vary prices for different credit terms? If this varies from your credit cost, how much does it cost your company to give this credit i.e. what are your payment terms and what is the interest rate charged? Please explain



24

Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

how you have calculated the credit cost. Specify the financial sources of the calculation.

11. Provide details of any taxes, duties or levies levied on the products under investigation or their components, which are remitted or refunded on export.
12. Identify all source documents on which you relied in preparing your response to this Section, and indicate the business location where the documents are maintained.

SECTION E: COSTS OF PRODUCTION

This section is important in determining the method by which the normal value is assessed and also for making adjustments where there is any difference between the products sold on the domestic market and those exported to Israel.

1. For the Dumping Period of Investigation, provide details of your actual unit costs to produce and sell the products under investigation, sold domestically and those exported to Israel. The details should be represented in the format of Table 5 below. A separate table should be supplied for each model/type. Where possible, please submit any supporting documents and worksheets supporting your calculation.



25

Trade Levies Unit
MINISTRY OF INDUSTRY, TRADE & LABOR

TABLE 5: COST OF PRODUCTION PER UNIT FOR THE DUMPING PERIOD OF INVESTIGATION

	COSTS PER UNIT EXPORTED TO ISRAEL (1)	COSTS PER UNIT SOLD IN DOMESTIC MARKET (2)
MODEL/TYPE		
Materials		
Total Material Costs		
Direct Labor		
Manufacturing Overheads (3)		
Packing Materials		
Other costs		
Total Costs of Production		
Selling Costs		
Administration costs		
Financial Costs		
Delivery Expenses		
Other Costs (4)		
Total Unit Cost to Produce		
Profit		
Unit Price		

Explanations:

1. Specify unit of currency (and exchange of rate if applicable).
 2. Specify which costs are included (e.g. indirect labor, depreciation, rent, energy, maintenance etc.)
 3. Relating to costs of production only: identify each cost separately.
 4. Identify each cost separately, please ensure non-operating expenses that relate to the products under investigation are included.
- In addition, please provide a compact disc or USB Flash Drive containing the information required. The data must be in Excel format.

2. Where there are differences between the products sold domestically and those exported to Israel, give the nature and reasons for these differences. Your argument should be supported by evidence.

3. Describe methods used in your general accounting system, Including but not limited to:
 - a. Methods used to value stock;
 - b. Methods used to account for incidental revenue;
 - c. Methods of allocating costs from general costs to specific products;



- d. If your allocation of selling, administration, finance and other costs differ from the proportion these costs bear to sales revenue as shown in your Profit and Loss statement for the period under inquiry, please explain;
 - e. Methods of calculating depreciation and useful life of fixed assets;
 - f. If standard costing is used rather than actual costs, describe the methods to determine standards, the frequency of revisions and the treatment of variances.
4. If the cost of producing and selling any one model/type of the products exceeds net selling price, please explain these sales at a loss. Do you expect to recover the losses on these sales? If so, give reasons and indicate over what period of time the losses are expected to be recovered.

SECTION F: ISRAELI MARKET - MATERIAL INJURY

Provide comments on the Israeli market, general market trends and/or any other factors you consider relevant to the claims of material injury to the Israeli industry.

Note that any comments should be supported by documentary evidence.