

(Tick the appropriate box)  
☐ CONFIDENTIAL VERSION  
☐ NON-CONFIDENTIAL  
(please refer Annex-I)



**Government of Pakistan  
Ministry of Commerce  
National Tariff Commission**

**EXPORTER'S QUESTIONNAIRE FOR**

**Anti-dumping Investigation against Alleged Dumped Imports of Disodium Carbonate (Soda Ash) into Pakistan Originating in and/or Exported from the Republic of Türkiye and the Republic of Kenya**

**Product under Investigation:** Disodium Carbonate or Soda Ash  
(PCT Code 2836.2000)

**Countries of Exportation:** Republic of Türkiye and the Republic of Kenya

**Period of Investigation:** April 01, 2022 to March 31, 2025

**Official in Charge:**

<b>Name</b>	: Muhammad Arshad
<b>Designation</b>	: Director
<b>Telephone</b>	: +92-51-9201188
<b>Fax</b>	: +92-51-9221205
<b>E-mail</b>	: <a href="mailto:arshad.ntc@outlook.com">arshad.ntc@outlook.com</a>

---

*Address: State Life Building No. 5, Blue Area, Islamabad, Pakistan*

*Phone No: 092-51-9202839, Fax No: 092-51-9221205*

*Visit us at: [www.ntc.gov.pk](http://www.ntc.gov.pk)*

**PLEASE NOTE THAT THIS QUESTIONNAIRE HAS TO BE COMPLETED TWICE, ONCE AS CONFIDENTIAL VERSION AND ONCE AS NON-CONFIDENTIAL VERSION FOR INSPECTION BY INTERESTED PARTIES**

## Introduction:

National Tariff Commission (the “Commission”) has received an application on June 27, 2025, under Section 20 of Anti-Dumping Duties Act, 2015 (the “Act”) from M/s. Lucky Core Industries Limited, Lahore and M/s. Olympia Chemical Limited, Lahore (the “Applicants”). The Applicants are producers of Soda Ash. The Applicants have alleged that Soda Ash is being exported to Pakistan at dumped prices from the Republic of Türkiye and the Republic of Kenya (the “Exporting Countries”), which have caused and are causing material injury and threat of material injury to the domestic industry producing Soda Ash.

Upon initial examination and assessing accuracy and adequacy of the evidence and information provided in application in accordance with Section 23 of the Act, the Commission is satisfied that the evidence and information provided in the application is sufficient to justify initiation of an investigation into the matter.

## General Instructions

This questionnaire is made to enable the national Tariff Commission (herein-after referred to as the “Commission”) to obtain information necessary to investigate alleged dumping.

It is in the interest of exporters/foreign producers to reply as accurately and completely as possible and to attach all the supporting documents as requested. If the required information is not communicated to the Commission within the time limit specified, the Commission may make its determinations on the basis of information available in accordance with the section 32 (1) of the Act. Such action may be adverse to the interests of parties who do not cooperate with the Commission in providing information requested in this questionnaire and any subsequent requests for information or clarification. If you are unable to answer any questions fully due to lack of data/information and in the format requested please describe the efforts you have made to obtain the data and why you have not been able to do so. You should immediately communicate to the Officer in Charge if you have particular difficulties. Communications with the Officer in Charge and with the Commission in general may be oral initially, but only explanations and suggestions submitted in written form will become part of the official record on which determinations will be made. The Commission is willing to consider alternate methods of reporting if they provide the Commission with adequate information in time to permit the timely completion of investigation and do not deprive other parties of their rights of participation.

You have to furnish two versions of this questionnaire, confidential version and non-confidential version. Non-confidential version would be placed in **Public File** established and maintained by the Commission in accordance with Rule 7 of Anti-Dumping Duties Rules, 2022. Public file is opened for inspection and copying throughout the investigation by the parties registered as ‘interested parties’ in this investigation. If you believe any information is confidential, you also must explain why it should be treated as confidential, unless the information is confidential by nature (prices of individual transactions, identity of your customers or suppliers, detailed internal cost information.). You must provide a non-confidential summary (please refer Annex-I for guidelines to prepare a non-confidential summary of the confidential information). If there is any information which you

wish to be treated as confidential but for which a non-confidential summary is not feasible, in that case you must explain why the information is not susceptible to summary. Failure to supply a non-confidential summary of confidential information or to justify why summarization is not possible will lead the Commission to disregard the said information altogether. As noted above, this will force the Commission to use information otherwise available in making its determinations, which may adversely affect your interests.

Answers to the questions must follow the respective format given in the questionnaire. Please repeat the question in your response. Your response should be in two paper copies. All worksheets and documents compiled to answer the questionnaire, in particular those linking the information supplied with management records and audited or unaudited accounts, must be retained for inspection. Also, note that you will be asked at several places to provide worksheets to illustrate your calculation methodology for portions of your response. The same requirements for the rest of your response apply to worksheets submitted.

The pages of the answer to the questionnaire should be consecutively numbered. Appendices should have their own numbering system, which includes the number of the appendix, and page number, (e.g 3-1, 3-2. etc.) If any of your answers to the question require an attachment, for example a copy of an agreement, the attachment should identify the question to which it responds, and page number. This will allow the Commission staff to readily relate the attachments to the response and refer to them in their written analysis of the investigation.

Your response to this questionnaire should be in English. Any source material that you provide with your response must be accompanied by a translation in English so as to allow its understanding. Failure to do so may preclude the Commission from considering the information.

If you have any queries about questionnaire, you should contact the identified Officer in Charge on the cover of this questionnaire within 15 days of receipt of the questionnaire.

## **SECTION A – GENERAL INFORMATION**

### **A IDENTIFICATION**

#### **A-1 Identify your company**

Name:  
Address:  
Telephone No:  
Fax No:  
E-mail Address:

#### **A-2 Identify the authorized contact person for your company for this investigation**

Name:  
Designation:  
Address:  
Telephone No:  
Fax No:  
E-mail address:

#### **A-.3 Legal Representative**

If you have appointed a legal representative to assist you in this proceeding, please provide following details:

Name:  
Address:  
Telephone No:  
Fax No:  
E-mail address:

#### **A-4 Corporate Information**

##### **A-4.1 Legal form of your company**

##### **A-4.2 Please indicate address (es) of all your offices involved in the administration, sales and production of the investigated product.**

##### **A-4.3 Supply detailed diagram outlining the overall internal hierarchical and organizational structure of your company.**

##### **A-4.4 Please provide your company's world-wide corporate structure and affiliations, including parent companies, subsidiaries or other related companies.**

A-4.5 Provide, for all countries, the following information for subsidiaries and related companies. Also specify the activities of each related/subsidiary company.

Name, address, telephone & fax Nos. of related company	List of activities	Involved with investigated product	Involved in production of investigated product	Customer for investigated product	Supplier of raw material for investigated product	Your percentage of share-holding in related company	Percentage of share-holding of related company in your company
		Yes/No	Yes/No	Yes/No	Yes/No		

A-4.6 Describe the nature of your relationship with related company (s). State whether you share any board members or senior executives with any of those entities. If so identify the persons and nature of their affiliations.

A-4.7 Specify in detail any financial or contractual links and joint ventures with any other company concerning production, sales, licensing, technical and patent agreements for the investigated product.

## SECTION – B INVESTIGATED PRODUCT

**B-1** The investigated product (hereinafter referred as the “IP”) is Disodium Carbonate or Soda Ash (the “investigated product”). The investigated product is classified under Pakistan Customs Tariff (“PCT”) Heading Nos. 2836.2000. The Investigated product is used in the manufacturing of detergents, soaps, cleaning compounds, sodium-based chemicals, float glass, container, tableware and specialty glasses, silicates and other industrial chemicals. It is also widely used in paper, metallurgical industries and desalination plants. The PCT No. is only given for information.

### **B-2 Specifications of the IP**

The following information is necessary to define and distinguish the different types of the IP produced and/or sold by your company and related companies

B-2.1 Explain in detail the types of the IP produced and/or sold by your company and your related companies. Also provide different characteristics and final uses of the IP.

B-2.2 Explain in detail all differences between IP sold by your company and your related companies on the domestic market and those exported to Pakistan. Points to be covered should include material, design, specifications and production processes. Explain any other factors that lead to a pricing differential between the types.

B-2.3 Describe in detail your company's product coding system. Provide a key to your production and sales codes, including all prefixes, suffixes, or other notations, which identify special specifications.

- B-2.4 Provide a complete set of catalogues and brochures issued by your company and/or your related companies covering all types of the IP.

## **SECTION – C EXPORT SALES OF THE IP TO PAKISTAN**

In this section please provide specific information on all of your sales of the IP for exports to Pakistan during the POI.

### **C-1 General Information**

- C-1.1 Explain your company's channels of distribution to Pakistan starting from the factory gate up to the first resale to unrelated customers. Include a detailed flow chart indicating terms of sale and pricing policies to each class of customer (e.g. end-users, distributors, etc.) including related companies.
- C-1.2 Describe each step in the sales negotiation process, from the first point of contact with customer through any after-sale price adjustments. If the sales process differs between classes of customers, please describe each variation separately.
- C-1.3 Where export sales to Pakistan were made through intermediate countries, please provide the following information:
- a) Explain each distribution channel through which the IP enters the Pakistan. Report the names of the companies involved and whether they are related to your company. Provide information on who holds legal title of the IP while it is in intermediate countries. List the qualities of IP and the countries from which they are shipped to Pakistan. Include a flow chart indicating the physical delivery, ordering, invoicing and payment of the sales concerned.
  - b) If there is any further processing or assembly, or if the IP is changed or enhanced in any way in intermediate country, explain in detail.
- C-1.4 For all sales through related companies, give a detailed description of how sales are made indicating the procedure followed between time of order and delivery to the first unrelated customer. A full explanation of how the invoicing and payment is made should be given.
- C-1.5 If your sales are made pursuant to contracts (either long-term or short-term), describe in detail the process by which the contracts, and the prices and quantities therein, are agreed upon. Describe each of the types of contracts applicable to the IP, including the terms, the requirements for a price change or re-negotiation by either side, etc. Explain any commitments on either party, should the contract be terminated prematurely.
- C-1.6 Explain whether production begins after the customer has ordered the product and the sale has been made, or pursuant to normal company production schedules.
- C-1.7 Provide copies of all price lists (in English or accompanied by English translation) issued or in use during the POI for exports to Pakistan, including those used by related

companies.

- C-1.8 List any cost incurred by your related companies that have been paid or reimbursed by your company, directly or indirectly, regardless of whether the cost was related to the IP. Explain in detail the nature of these costs.

## **C-2 Allowances on Export Sales**

In order to carry out a fair comparison between the **export price** and the **normal value** of the IP, the following information is requested. Where the normal value and the export price as established are not on a comparable basis, due allowance, in form of adjustments, should be made where prices and price comparability are affected. For this purpose you should claim adjustments where it can be demonstrated that the factor concerned is one that has resulted in a different price being charged to your customers. You are requested to explain in detail all adjustments that could affect price comparisons, to report them on a transaction by transaction basis. Report actual expenses rather than averages. If you allocate any of these expenses, explain the reason for your choice and the methodology used:

### **C-2.1 DIFFERENCES IN DISCOUNTS, REBATES, AND QUANTITIES**

Describe in detail your policy for granting discounts and rebates to customers in Pakistan. List all different kinds of discounts or rebates you granted, e.g. cash discounts, quantity discounts, loyalty discounts, year-end rebates, etc., and describe their terms. Include deferred discounts. If discounts or rebates vary by class of customer, explain separately the discounts and rebates given to each class. Note that the term "rebate" includes credit on current or future purchases, promissory notes, extension of credit, or free goods or services.

List all of your customers who were eligible for each discount or rebate program, and describe the criteria you used to determine their eligibility.

Provide your discount schedules, and be prepared to furnish on request contracts or agreements that reflect all discounts and rebates that were given.

Report the adjustment in the transaction-by-transaction listing below (see point C-3 below).

### **C-2.2 DIFFERENCES IN TRANSPORTATION, INSURANCE, HANDLING, LOADING, AND ANCILLARY COSTS**

List all charges that are included in the export prices and explain how you have quantified each of these charges. Identify the general ledger account(s) where each such expense is located.

As far as transportation costs are concerned your attention is drawn to the fact that an adjustment can only be made for transportation costs that were incurred subsequent to the sale being made, for moving the products from the production premises to the unrelated customer. Report the adjustment in the transaction-by-transaction listing at point C-3 below).

### **C-2.3 DIFFERENCES IN PACKING COSTS**

Specify the cost of packing for the IP. List material and labour costs separately. Be specific in describing packing materials and any special or extraordinary procedures used in preparing the IP for shipment to Pakistan. If the IP is repackaged in Pakistan, report these charges and costs separately.

Report the adjustment in the transaction-by-transaction listing (see point C-3 below). Identify the general ledger account where the expense is located.

### **C-2.4 DIFFERENCES IN THE COST OF ANY CREDIT GRANTED FOR THE EXPORT SALES**

Cost of credit refers to the "costs" of granting credit for a specific sales transaction. The agreed terms of payment must be known to the parties involved and the cost of the credit terms must be reflected in the sales price of the IP. Describe the method you have used to calculate the credit costs. Indicate the interest rate you used to compute expenses associated with granting credit on sales.

Provide information on interest rates that you paid for short-term borrowings for the currencies concerned. Explain your calculation of the credit costs reported in the transaction-by-transaction listing (see C-3 below).

### **C-2.5 DIFFERENCES IN THE DIRECT COSTS OF PROVIDING WARRANTIES, GUARANTEES, TECHNICAL ASSISTANCE AND SERVICES, AS PROVIDED FOR BY LAW AND/OR IN THE SALES CONTRACT**

List all costs mentioned above that were incurred and were specified in the export sales contracts, or were required by the law of the country concerned, e.g. the cost of the materials concerned.

Provide a record of warranty/guarantee expenses incurred for sales of the IP during the POI.

State how you calculated these expenses. Identify your source of data. If these expenses were incurred only for certain customers, provide customer specific information. Explain your calculation of warranty/guarantee costs in the transaction-by-transaction listing at C-3 below.

Cost for technical services can include any service; repair, or consultation you provide to a customer regarding the IP. An adjustment can only be made for expenses that are directly related to the sales of the IP. If technical assistance and services are performed by a division or cost centre of your firm, identify that division. Describe any technical assistance and service provided on the export market. Note any reimbursement you received for these services.

Report the adjustment in the transaction-by-transaction listing at C-3 below. Identify the general ledger account where the expense is located.



## **C-2.6 DIFFERENCES IN COMMISSIONS PAID IN RESPECT OF THE SALES UNDER CONSIDERATION**

Where commissions were paid to agents, unrelated or related sellers, report the amount of commission expenses and explain the terms under which commissions are given. Report the adjustment in the transaction-by-transaction listing at C-3 below. Identify the general ledger account where the expense is located.

## **C-2.7 CURRENCY CONVERSIONS**

In order to compare export with domestic sales prices a conversion of currency will be required. Fluctuations in exchange rates can only be taken into account under certain circumstances, i.e. when a fluctuation becomes a "sustained" movement.

If you claim an adjustment for currency conversion, provide detailed information on the movement in exchange rates in your country. Provide the official central bank exchange rates specifying the official daily buying and selling rates of exchange used for the foreign currencies concerned during the last two years in connection with the export of goods and services. Provide the unofficial exchange rates and the sources of these rates. Explain the adjustment you claim in the transaction-by-transaction listing (see C-3 below).

If you bought foreign currency in advance of the date of sale, provide the details of the forward purchase and explain whether the purchase was specifically linked to export transactions. If so, state the exchange rates of the forward purchase for the specific sale concerned in the transaction-by-transaction listing below (see C-3 below).

## **C-2.8 OTHER FACTORS**

An adjustment may also be made for differences in other factors not provided above if it is demonstrated that they affect price comparability, in particular that customers consistently pay different prices on the domestic market because of the difference in such factors.

### C-3 Information on Export Transactions

Following information should be provided for each transaction separately in a table form. This information should also be supplied on CD ROM. These data files should be compatible to the US versions in EXCEL format.

	<b><u>Information Required</u></b>	<b><u>Field Name</u></b>
A	Sequential number for the transaction/shipment	<b>S. No.</b>
B	Product code (if any)	<b>Code</b>
C	Product description	<b>Product</b>
D	Date of issue of the invoice	<b>IN. Date</b>
E	Invoice number.	<b>IN. No</b>
F	Number of the bill of lading or other transport document.	<b>LB No</b>
G	Sales order or contract number.	<b>SALORDNo</b>
H	Date of the sales order or contract.	<b>SaleDate</b>
I	Customer name.	<b>CUS. Name</b>
J	Relationship with customer (show code "U" for "Unrelated customer", and code "R" for "Related customer").	<b>CUS.REL</b>
K	Quantity (in units) of the IP, (for this transaction).	<b>QTY</b>
L	Gross value of this transaction in the currency of sale.	<b>G.Value</b>
M	Currency of sale	<b>Currency</b>
N	Number of the credit note (if any).	<b>Crdt N.No</b>
O	Date of the credit note issued.	<b>Crdt Date</b>
P	Quantity (in units) credited.	<b>Crdt Qty</b>
Q	Value credited.	<b>Crdt Value</b>
R	Net quantity (in units) (quantity of the invoice minus quantity of the credit note)	<b>Net Qty</b>
S	Payment terms (e.g. at sight, 30 days, etc.)	<b>P.Terms</b>
T	CIF Value	
U	Interest rate (if sales is made on credit)	<b>Int Rate</b>
V	Credit Cost	<b>Crdt Cost</b>
W	Delivery terms (e.g. FOB, C&F, CIF, etc.).	<b>Del Terms</b>
X	The actual amount of discounts which were not deducted on the invoice.	<b>Discount</b>
Y	The actual amount of the rebate.	<b>Rebate</b>
Z	The amount of commission paid (if any).	<b>Commission</b>
AA	The amount of inland freight in exporting country.	<b>Inl Frt</b>
AB	The amount of ocean freight.	<b>Ocn Frt</b>
AC	The amount of insurance cost.	<b>Insurance</b>
AD	The amount of inland freight paid from the Pakistani port to the unrelated customer (if any).	<b>InlPk Frt</b>
AE	The amount of Handling, loading and ancillary expenses.	<b>Handl Cost</b>
AF	The bank charges related to this transaction, e.g. document fee, bank commission, currency exchange, etc..	<b>Bank Char</b>
AG	The amount of warranty and guarantee expenses (if any).	<b>Warnty</b>

AH	The amount of the expenses for technical assistance and services.	<b>Tech Asst</b>
AI	In case you paid customs duties, in Pakistan indicate the amount.	<b>Cus.Duty</b>
AJ	In case you claim any other non-specified allowance (please specify).	<b>Other</b>
AK	Net Value of this transaction (gross value-adjustments)	<b>Net Value</b>
AL	Exchange rate used for the conversion of the currency of sale to your own accounting currency.	<b>Exchange</b>

#### **C-4 Information on all Pakistani Customers**

Provide the following information on all Pakistani customers.

Customer name  
Customer address (Provide the complete address, telephone No., Fax No. of your customer).  
  
Customer relation (Whether your customer is related with you or not).  
  
Customer Level of trade (For example distributor, retailer, end-user etc)  
  
Turnover (Report the turnover of the IP per customer during the POI).  
  
Total amount of all discounts, rebates, etc. (Report the total amount of all discounts, rebates and bonuses, etc. granted to the customer for the IP).  
  
General terms of delivery [Indicate the general agreed terms of delivery per customer (e.g. FOB, C&F, CIF, etc.).]  
General payment terms (Indicate the payment terms agreed with the customer (e.g. at sight, 30 days credit, etc.)

### **SECTION D – DOMESTIC SALES OF THE IP**

In this section please provide specific information on all of your sales of the IP in your domestic market during the POI.

#### **D-1 General Information**

- D-1.1 Explain your company's channels of distribution on your domestic market starting from the factory gate up to the first resale to unrelated customers. Include a detailed flow chart indicating terms of sale and pricing policies to each class of customer (e.g. end-users, distributors, etc.) including related companies.
- D-1.2 Describe each step in the sales negotiation process, from the first point of contact with customer through any after-sale price adjustments. If the sales process differs between

classes of customers, please describe each variation separately.

- D-1.3 For all sales through related companies, give a detailed description of how sales are made indicating the procedure followed between time of order and delivery to the first unrelated customer. A full explanation of how the invoicing and payment is made should be given.
- D-1.4 If your sales are made pursuant to contracts (either long-term or short-term), describe in detail the process by which the contracts, and the prices and quantities therein, are agreed upon. Describe each of the types of contracts applicable to the IP, including the terms, the requirements for a price change or re-negotiation by either side, etc. Explain any commitments on either party, should the contract be terminated prematurely.
- D-1.5 Explain whether production begins after the customer has ordered the product and the sale has been made, or pursuant to normal company production schedules.
- D-1.6 Provide copies of all price lists (in English or accompanied by English translations) issued or in use during the POI for sales made on your domestic market, including those used by related companies.
- D-1.7 List any cost incurred by your related companies that have been paid or reimbursed by your company, directly or indirectly, regardless of whether the cost was related to the IP. Explain in detail the nature of these costs.

## **D-2 Allowances on Domestic Sales**

In order to carry out a fair comparison between the **export price** and the **normal value** of the IP, the following information is requested. Where the normal value and the export price as established are not on a comparable basis, due allowance, in form of adjustments, should be made where prices and price comparability are affected. For this purpose you should claim adjustments where it can be demonstrated that the factor concerned is one that has resulted in a different price being charged to your customers. You are requested to explain in detail all adjustments that could affect price comparisons, to report them on a transaction by transaction basis at point D-3. Report actual expenses rather than averages. If you allocate any of these expenses, explain the reason for your choice and the methodology used:

### **D-2.1 DIFFERENCES IN PHYSICAL CHARACTERISTICS**

In comparing the product sold to Pakistan with the most similar domestic market product, an adjustment can be made to take account of physical differences between both the products.

The amount of the adjustment shall correspond to a reasonable estimate of the difference in market value between the comparable type sold on the domestic market and the type exported to Pakistan if it was sold on the domestic market. Identify the physical differences separately for each type. Provide a detailed list of all physical differences with a full explanation of each item listed. For each difference claimed provide detailed

information of the market value of such difference. Identify the source of your data. Report the amount of such difference in the transaction-by-transaction listing at point D-3 below).

## **D-2.2 IMPORT CHARGES OR INDIRECT TAXES**

An adjustment concerning import charges and indirect taxes can be made. For such adjustments provide the following information:

### **a) Duty drawback**

Provide original and English translations of statutes and regulations authorising duty drawback on exported goods and governing the methods used to calculate duty drawback.

Report the total amounts of duty drawback you received separately for sales to Pakistan and for sales to third countries, and these separately for the IP and for other products.

Provided on a transaction-by-transaction basis, the amount of duty drawback you received for each sale to Pakistan at point D-3 below. Explain how you calculated this amount for each transaction.

Explain the method you used to connect the duty drawback amount to the specific Pakistani sale.

### **b) Indirect taxes**

List all indirect taxes imposed on sales of IP in your domestic market which were either fully or partially exempted upon exportation or not collected on the products exported to Pakistan.

For each tax listed above, provide English translations of statutes and regulations authorising the collection of the tax, including documents which explain the method of calculation, assessment, and payment of the tax.

For each tax listed above, separately provide information on the tax base or taxable price, the tax rate, the amount of taxes assessed, any deductions or offsets to the tax and the formula used to calculate the tax amount.

Indicate when you have a legal obligation or liability to pay tax. Report when you actually paid taxes and whether you maintain separate accounts for these taxes.

Report in the transaction-by-transaction (see D-3 below) the amount of such taxes applicable to each domestic sale.

## **D-2.3 DIFFERENCES IN DISCOUNTS, REBATES, AND QUANTITIES**

Describe in detail your policy for granting discounts and rebates to your domestic customers. List all different kinds of discounts or rebates you granted, e.g. cash discounts, quantity discounts, loyalty discounts, year-end rebates, etc., and describe their terms. Include deferred discounts. If discounts or rebates vary by class of customer, explain

separately the discounts and rebates given to each class. Note that the term "rebate" includes credit on current or future purchases, promissory notes, extension of credit, or free goods or services.

List all of your customers who were eligible for each discount or rebate program, and describe the criteria you used to determine their eligibility.

Provide your discount schedules, and be prepared to furnish on request contracts or agreements that reflect all discounts and rebates that were given.

Report the adjustment in the transaction-by-transaction listing at point D-3 below.

#### **D-2.4 DIFFERENCES IN THE LEVEL OF TRADE**

An adjustment for differences in levels of trade, including any differences which may arise in OEM (Original Equipment Manufacturer) sales, can be made where, in relation to the distribution chain in both markets, it is shown that the export price, including a constructed export price, is at a different level of trade from the normal value and the difference has affected price comparability which is demonstrated by consistent and distinct differences in functions and prices of the seller for the different level of trade in the domestic market of the exporting country. The amount of the adjustment has to be based on the market value of the difference.

However, in circumstances not envisaged in the paragraph above, when an existing difference in level of trade cannot be quantified because of the absence of the relevant levels on the domestic market of the exporting country, or where certain functions are shown clearly to relate to levels of trade other than the one which is to be used in the comparison, a special adjustment may be granted.

If you claim a level of trade adjustment the following information should be provided:-

- a detailed description of the functions of each level of trade both on the domestic market and Pakistani market.
- a detailed description of the method used to determine the amount of adjustment.
- evidence showing that prices differ consistently for the different levels of trade on the domestic market.
- report in the transaction-by-transaction listing (at point D-3 below) the market value of the difference in level of trade.

#### **D-2.5 DIFFERENCES IN TRANSPORTATION, INSURANCE, HANDLING, LOADING, AND ANCILLARY COSTS**

List all charges that are included in domestic prices and explain how you have quantified each of these charges. Report the adjustment in the transaction-by-transaction listing at point D-3 below. Identify the general ledger account(s) where each such expense is located.

As far as transportation costs are concerned your attention is drawn to the fact that an adjustment can only be made for transportation costs that were incurred subsequent to the sale being made, for moving the products from the production premises to the customer.

#### **D-2.6 DIFFERENCES IN PACKING COSTS**

Specify the per unit cost of packing for the IP. List material and labour costs separately. Be specific in describing packing materials.

Report the adjustment in the transaction-by-transaction listing below (see point D-3 below). Identify the general ledger account where the expense is located.

#### **D-2.7 DIFFERENCES IN THE COST OF ANY CREDIT GRANTED FOR THE SALES**

Cost of credit refers to the "costs" of granting credit for a specific sales transaction. The agreed terms of payment must be known to the parties involved and the cost of the credit terms must be reflected in the sales price of the IP. Describe the method you have used to calculate the credit costs. Indicate the interest rate you used to compute expenses associated with granting credit on sales.

Provide information on interest rates that you paid for short-term borrowings for the currencies concerned. Explain your calculation of the credit costs reported in the transaction-by-transaction listing (see D-3 below).

#### **D-2.8 DIFFERENCES IN THE DIRECT COSTS OF PROVIDING WARRANTIES, GUARANTEES, TECHNICAL ASSISTANCE AND SERVICES, AS PROVIDED FOR BY LAW AND/OR IN THE SALES CONTRACT**

List all costs mentioned above that were incurred and were specified in the domestic sales contracts, or were required by the law of the country concerned, e.g. the cost of the materials concerned.

Provide a record of warranty/guarantee expenses incurred for sales of the IP during the POI.

State how you calculated these expenses. Identify your source of data. If these expenses were incurred only for certain customers, provide customer specific information. Explain your calculation of warranty/guarantee costs in the transaction-by-transaction listing at D-3 below.

Cost for technical services can include any service; repair, or consultation you provide to a customer regarding the IP. An adjustment can only be made for expenses that are directly related to the sales of the IP. If technical assistance and services are performed by a division or cost centre of your firm, identify that division. Describe any technical assistance and service provided on the export market. Note any reimbursement you received for these services.

Report the adjustment in the transaction-by-transaction listing at D-3 below. Identify the general ledger account where the expense is located.

## **D-2.9 DIFFERENCES IN COMMISSIONS PAID IN RESPECT OF THE SALES UNDER CONSIDERATION**

Where commissions were paid to agents, unrelated or related sellers, report the amount of commission expenses and explain the terms under which commissions are given. Report the adjustment in the transaction-by-transaction listing at D-3 below. Identify the general ledger account where the expense is located.

## **D-2.10 OTHER FACTORS**

An adjustment may also be made for differences in other factors not provided above if it is demonstrated that they affect price comparability, in particular that customers consistently pay different prices on the domestic market because of the difference in such factors.

## **D-3 Information on Domestic market customers**

Following information should be provided for each transaction separately in a table form. This information should also be supplied on CD ROM. These data files should be compatible to the US versions in EXCEL format.

	<b><u>Information Required</u></b>	<b><u>Field Name</u></b>
A	Sequential number for the transaction	<b>S. No.</b>
B	Product code (if any)	<b>Code</b>
C	Product description	<b>Product</b>
D	Date of issue of the invoice	<b>IN. Date</b>
E	Invoice number.	<b>IN. No</b>
F	Number of the bill of lading or other transport document.	<b>LB No</b>
G	Sales order or contract number.	<b>SALORDNo</b>
H	Date of the sales order or contract.	<b>SaleDate</b>
I	Customer name.	<b>CUS. Name</b>
J	Relationship with customer (show code "U" for "Unrelated customer", and code "R" for "Related customer").	<b>CUS.REL</b>
K	Quantity (in units) of the IP, (for this transaction).	<b>QTY</b>
L	Gross value of this transaction in the currency of sale.	<b>G.Value</b>
M	Currency of sale	<b>Currency</b>
N	Number of the credit note (if any).	<b>Crdt N.No</b>
O	Date of the credit note issued.	<b>Crdt Date</b>
P	Quantity (in units) credited.	<b>Crdt Qty</b>
Q	Value credited.	<b>Crdt Value</b>
R	Net quantity (in units) (quantity of the invoice minus quantity of the credit note)	<b>Net Qty</b>
S	Payment terms (e.g. at sight, 30 days credit, etc.)	<b>P.Terms</b>
T	Interest rate (if sales is made on credit)	<b>Int Rate</b>
U	Credit Cost	<b>Crdt Cost</b>
V	Delivery terms	<b>Del Terms</b>



W	The actual amount of discounts which were not deducted on the invoice.	<b>Discount</b>
X	The actual amount of the rebate.	<b>Rebate</b>
Y	The amount of commission paid (if any).	<b>Commission</b>
Z	Adjustment for physical difference	<b>Physical</b>
AA	Adjustment for duty draw back	<b>Duty DB</b>
AB	Amount of indirect taxes	<b>Ind Tax</b>
AC	The amount of freight in domestic market.	<b>Freight</b>
AD	The amount of insurance cost.	<b>Insurance</b>
AE	The amount of Handling, loading and ancillary expenses.	<b>Handl Cost</b>
AF	The bank charges related to this transaction, e.g. document fee, bank commission, currency exchange, etc..	<b>Bank Char</b>
AG	The amount of warranty and guarantee expenses (if any).	<b>Warnty</b>
AH	The amount of the expenses for technical assistance and services.	<b>Tech Asst</b>
AI	In case you claim any other non-specified allowance (please specify).	<b>Other</b>
AJ	Net Value of this transaction (gross value-adjustments)	<b>Net Value</b>
AK	Per unit total cost of production (cost of production plus administrative, selling and financial expenses) for this transaction	<b>COP</b>

#### **D-4 Information on all Your Domestic Market Customers**

Provide the following information on all your domestic customers.

Customer name	
Customer address	(Provide the complete address of your customer).
Customer relation	(Whether your customer is related with you or not).
Customer Level of trade	(For example distributor, retailer, end-user etc)
Turnover	(Report the turnover of the IP per customer during the POI).
Total amount of all discounts, rebates, etc.	(Report the total amount of all discounts, rebates and bonuses, etc. granted to the customer for the IP).
General terms of delivery	(Indicate the general agreed terms of delivery per customer)
General payment terms	(Indicate the payment terms agreed with the customer (e.g. At sight, 30 days credit, etc.)

## SECTION E – OPERATING STATISTICS

### E-1 Total Quantity and Value of Sales

Please fill in the Appendix No. 1 for the sales of the IP during the periods given in the Appendix.

### E-2 Distribution Channels

Please indicate the turnover of the IP, during the POI, according to each of the following distribution channels:

Distribution channel	Sales on the Domestic market	Sales on the Pakistani Export market
OEM		
Distributors		
Retailers		
End-users		
Other (please specify)		
<b>TOTAL</b>		

## SECTION F - COST OF PRODUCTION

You should report per-unit COP information for each type of IP in Appendix No. 2

The amounts reported in Appendix 2 should be based on the actual costs incurred by your company as recorded in your normal accounting system.

If you produce the product under investigation at more than one facility, you should report based on the weighted-average of costs incurred at all facilities, using quantity as the weighting factor.

Indicate your normal corporate financial accounting period.

Please indicate the address where the accounting records concerning the activities of the company are located. If they are maintained in different locations please indicate which records are kept at what location.

Attach an English version of the audited accounts including Balance sheet, Profit and loss accounts and all reports, notes, footnotes and auditor's opinion to these documents for the last three financial years for your company as well as for those companies related to you which are involved in the production, marketing or sales of the IP. If applicable, you should also provide copies of the consolidated financial statements for the same periods. In the event that your company's accounts have not been audited, attach the financial statements that are required by your country's business law. Provide copies of any financial statement or other financial report filed with the local or national government of the country in which your company or the related companies were located for the three most recent financial years.

If internal financial statements, management reports, standard cost reviews etc. are prepared and maintained for the IP, provide copies for the three most recent financial years.

Provide a chart of accounts (translated into English). This list should also contain numbers and labels of accounts used for analytic purposes.

## **F-1 General Information Needed**

The production process, financial accounting, and cost accounting information requested below is necessary for the Commission to better understand your operations, products and production processes, and financial and cost accounting practices. Please provide complete and detailed narrative responses to each of the items listed below.

### **F-1.1 Products and Production Process**

Provide a description of your production process for the product under investigation including:

- a description of your production facilities.
- a flowchart of the production process for the product under investigation.
- a description of how you account for processing yields or losses throughout the production cycle. Indicate each stage in the production cycle where processing yields are measured.
- all joint products, scrap, or byproducts that result from producing the product under investigation and where in the production process they become individually identifiable. State whether any scrap material generated is reintroduced into the production cycle as raw materials, sold, or otherwise disposed of in the normal course of business.
- all inputs used to produce the product under investigation.

### **F1.2 Financial Accounting Systems and Policies**

Please provide a flowchart illustrating your financial accounting books and record keeping system. Indicate in your flowchart all subsidiary ledgers and reports generated by your financial accounting system, (e.g., subsidiary ledgers maintained for raw materials purchases, inventories, sales, accounts receivable, etc.). Show in your flowchart how data from your financial accounting system are summarized in financial statements.

### **F1.3 Cost Accounting Systems and Policies**

Describe your normal cost accounting system and how it is used to classify, allocate, aggregate, and record the costs incurred to produce the product under investigation in the

normal course of business. Your description should be provided in narrative form and should include a flow chart that (1) illustrates how the system records and reports costs for the merchandise throughout the production process, and (2) shows the various subsidiary cost ledgers maintained under the system and how they reconcile to your normal financial statement data. In addition describe:

- the method used under your cost accounting system to account for scrap generated at each stage of the production process.
- the method used under your cost accounting system to account for byproducts and joint products that result from producing the merchandise under investigation.
- all production costs incurred by your company which are valued differently for cost accounting purposes than for financial accounting purposes.
- how you value opening and closing inventories and materials issued for production.
- how you charge depreciation in the accounts e.g. straight line or other method
- how respective rates and amounts of interest on owners' capital and/ or loan are charged in the accounts.
- the subsidies/ rebates, export rebate available/ received and their treatment in the accounts;
- how indirect costs have been allocated to joint products and by-products e.g. market/ sales value method, quantitative/ physical unit method, average unit cost method, weighted average method etc.
- how specific items are treated differently in your financial and cost accounting systems.

#### **F1.4 Worksheets**

For the model with the highest volume of production for sale in the home market, provide worksheets that illustrate:

- i. How you computed direct materials, direct labor, and fixed and variable overhead costs. If you rely on a standard cost accounting system, the worksheets should show how you allocated any cost variances in deriving actual production costs.
- ii. How you computed general and administrative expense ratios. The worksheet should demonstrate how the G&A expenses used for Appendix 2 reconcile to your financial statements.

- iii. How you computed your net interest expense ratio. The worksheet should demonstrate how the interest income and expense figures used for Appendix 2 interest reconcile to your financial statements.

## **F-2 Production Process**

Describe the manufacturing process for the IP. Your description should include the following:

- a) A description of your company's production facility. If production or any one process takes place at more than one facility, list all facilities informing their location, and provide brief descriptions of the production activities that take place at those major facilities.
- b) Please provide a list of all companies that are involved on a subcontracting basis in the manufacture of the IP. Describe the part of the manufacturing process they are performing.
- c) Explain the production process of the IP produced and sold by your firm and attach a complete flowchart of the production cycle, including descriptions of each stage in the process.
- d) In case primary materials or components are used for the manufacturing of both the IP and other products not subject to this proceeding please provide information concerning the overlapping material use.
- e) Identify any products manufactured by your company in the same production facilities as the IP.
- f) Identify the major "by-products" resulting from the production of the IP and describe the use given to these "by-products".
- g) List the primary materials used in the manufacturing process and your relationship with the main suppliers (whether related or not). Indicate whether the primary materials were imported, and explain whether the value of the primary material includes import charges or indirect taxes.
- h) Provide the number of days for which the IP is held in inventory in either market (domestic and export) prior to the time of sale.

## **F-3 Purchase of Raw Materials**

Please provide a complete information in **Appendix No.3** of your purchases of raw materials or components used for the production of the IP, during the POI. This list should at least contain references to the country of origin, date of purchase, weight/units, price, delivery terms, import duties paid, and should also allow a direct link to the original purchasing documents.

## SECTION G - EXCHANGE RATE



Please provide information on exchange rate in the following table

*Exchange rates per one unit (e.g. Euro) currency of exporting country*

Period	USD	Pak Rupees
<i>Year Jan 2022- Dec 2022</i>		
<i>Year Jan 2023- Dec 2023</i>		
January 2024		
February 2024		
March 2024		
April 2024		
May 2024		
June 2024		
July 2024		
August 2024		
September 2024		
October 2024		
November 2024		
December 2024		
January 2025		
February 2025		
March 2025		

## SECTION G – CHECK LIST

The purpose of the following checklist is to ensure that you have answered all questions of the above Sections and to permit a quick survey on information, which may be missing. You are requested to tick the box where complete information is submitted or where information has not sufficiently been provided:

<b>SECTION</b>	PLEASE TICK IF YOU SUBMITTED ALL INFORMATION REQUESTED 	PLEASE TICK IF INFORMATION IS NOT OR INSUFFICIENTLY SUBMITTED 
<b>SECTION A:</b> GENERAL INFORMATION	<input type="checkbox"/>	<input type="checkbox"/>
<b>SECTION B:</b> INVESTIGATED PRODUCT (IP)	<input type="checkbox"/>	<input type="checkbox"/>
<b>SECTION C:</b> EXPORT SALES OF THE IP TO PAKISTAN	<input type="checkbox"/>	<input type="checkbox"/>
<b>SECTION D:</b> DOMESTIC SALES OF THE IP	<input type="checkbox"/>	<input type="checkbox"/>
<b>SECTION E:</b> OPERATING STATISTICS	<input type="checkbox"/>	<input type="checkbox"/>
<b>SECTION F:</b> COST OF PRODUCTION	<input type="checkbox"/>	<input type="checkbox"/>
<b>SECTION G :</b> EXCHANGE RATE	<input type="checkbox"/>	<input type="checkbox"/>

### **CERTIFICATION**

The undersigned certifies that all information herein supplied in response to the questionnaire is complete and correct to the best of my knowledge and belief, and understands that the information submitted may be subject to audit and verification by the Pakistan National Tariff Commission.

---

Date

---

Signature of Authorised official

---

Name and title of Authorised official



## APPENDIX NO 1

### QUANTITY AND VALUE OF TOTAL SALES

(Specify unit of measurement e.g tonne,Kg. litre etc and currency unit.)

Name of country	Product Name	April 2022 - March 2023								April 2023 - March 2024								April 2024 - March 2025							
		1 <sup>st</sup> Quarter		2 <sup>nd</sup> Quarter		3 <sup>rd</sup> Quarter		4 <sup>th</sup> Quarter		1 <sup>st</sup> Quarter		2 <sup>nd</sup> Quarter		3 <sup>rd</sup> Quarter		4 <sup>th</sup> Quarter		1 <sup>st</sup> Quarter		2 <sup>nd</sup> Quarter		3 <sup>rd</sup> Quarter		4 <sup>th</sup> Quarter	
		Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value	Quantity	Value
Pakistan																									
Country A																									
Country B																									
Country C																									
Country D																									
Country ...																									
Domestic sales																									
<b>Total</b>																									

Specify the units of quantity and currency used. If you sell to a related importer in Pakistan report the total quantity and value of sales of the product in Pakistan by the related importer to an independent buyer. If you sell both to independent and related importers, report the quantities and values separately for each type of sale

## APPENDIX NO. 2

### COST OF PRODUCTION

#### **Guidelines:**

- a) *If the company is manufacturing more than one product the information for each product/ by-product may be given in separated tables*
- b) *Indicate significant accounting practices in respect of the followings if not given in audited accounts:-*
  - i) *how opening and closing inventories and materials issued for production have been valued;*
  - ii) *method of charging depreciation in the accounts e.g. straight line method etc.;*
  - iii) *indicated respective rates and amounts if interest on owners' capital and/ or loan as has been charged in the accounts;*
  - iv) *the subsidies/ rebates, export rebate available/ received and their treatment in the accounts;*
  - v) *explain how indirect costs have been allocated to joint products/ by-products e.g. market/ sales value method, quantitative/ physical unit method, average unit cost method, weighted average method etc.*

(Specify unit of measurement e.g tonne,Kg. litre etc and currency unit.)

S. No		POI Actual/Audited/Provisional With Currency			Last Year Actual/ Audited With Currency			The Year Before Last Year Actual/ Audited With Currency		
		Fixed	Variable	Total	Fixed	Variable	Total	Fixed	Variable	Total
01	Raw material cost net of inventory adjustments									
02	Packing material cost									
03	Manufacturing salaries and wages									
04	Manufacturing overheads									
	i) Stores, spares/ supplies									
	ii) Electricity									
	iii) Gas/ fuel									
	iv) Repair & maintenance									

	<b>v) Depreciation</b>									
	<b>vi) Misc./ other expenses</b>									
<b>05</b>	<b>Inventory adjustment of semi-finished goods</b>									
<b>06</b>	<b>Less income of by-products</b>									
<b>07</b>	<b>a) Cost of goods manufactured (1to 6)</b> <b>b) Quantity manufactured (Tonne/ litre/ no. etc)</b>									
<b>08</b>	<b>a) Inventory adjustment of finished goods</b> <b>b) Quantity of goods adjusted (tonne/ litre/ No. etc)</b>									
<b>09</b>	<b>a) Manufacturing cost of sales (7+ or –8)</b> <b>b) Quantity of goods sold (tonne/ litre/ No. etc)</b>									
<b>10</b>	<b>Administrative expenses</b>									
<b>11</b>	<b>Selling &amp; distribution expenses</b>									
<b>12</b>	<b>Financial expenses</b>									
<b>13</b>	<b>Less other income (indicate nature)</b>									
<b>14</b>	<b>Cost to make &amp; sell (9 to 13)</b>									
<b>15</b>	<b>Profit/ (loss)</b>									
<b>16</b>	<b>Ex-factory sales (net of discount/ commission) excluding taxes/ duties.</b>									
<b>17</b>	<b>Sales tax @</b>									
<b>18</b>	<b>Ex-factory sales including taxes/ duties (16 to 18)</b>									
<b>19</b>	<b>Whole seller's profit/ commission</b>									
<b>20</b>	<b>Additional sales tax on whole sale</b>									

	<b>price</b>									
<b>21</b>	<b>Whole sales price including all taxes</b>									
<b>22</b>	<b>Retailer's profit/ commission</b>									
<b>23</b>	<b>Additional sales tax on retail price</b>									
<b>24</b>	<b>Retail price including all taxes</b>									

**Information should be provided as per report of audited accounts**

### **Appendix No. 3**

#### **Cost of Imported/Locally Procured Raw Materials and Packing Materials for Production of Investigated Product During the POI**

(Specify unit of measurement e.g tonne,Kg. litre etc and currency unit.)

Description of raw/packing material with unit of measurement	Source of import/purchase	Purchase Date	Invoice No	H.S code.	Quantity procured (MT, Kg, no. etc)	C&F Price	Customs Duty	VAT	Other taxes/duties (pl. specify)	Landed Cost (Total)	Quantity required to produce one unit of the IP	Cost per unit of output

## **GUIDELINES FOR COMPLETING THE NON-CONFIDENTIAL VERSION OF THE QUESTIONNAIRE**

When completing the questionnaire destined for inspection by interested parties (non-confidential version of the questionnaire) you should bear in mind that all the parties registered as interested parties in this investigation will have access to it. The reply destined for inspection by interested parties should be sufficiently detailed to permit a reasonable understanding of the substance of the information submitted as 'confidential'. When completing the questionnaire destined for inspection by interested parties the Commission advise you to act as follows:

1. Use the completed 'confidential version' of questionnaire response as a basis. Identify all information in the 'confidential' response, which you consider is not confidential, and copy it to the file destined for inspection by interested parties.
2. After this, check again whether the information you did not copy to the response destined for inspection by interested parties is really confidential. If you still consider it to be confidential, you must give the reasons why, item by item and summarise the confidential information in a form destined for inspection by interested parties. If, in exceptional circumstances, it is not possible to even summarise the confidential information, give reasons why summarisation is not possible.

### ***Examples on how to summarise confidential information.***

- **When the information concerns numbers for various years you can use indices.**

Example of **confidential** information:

<b>2021</b>	<b>2022</b>	<b>2023</b>
20.000 Rupees	30.000 Rupees	40.000 Rupees

The summary destined for inspection by interested parties could be as follows:

<b>2021</b>	<b>2022</b>	<b>2023</b>
=100	150	200

- **When the information concerns a single number you can apply a % change to it.**

Example of **confidential** figure:

"My cost of production is Rs. 300 per tonne."

The summary destined for inspection by interested parties could be as follows:

"My cost of production is Rs. 330 per tonne" (+ footnote saying: "actual numbers have been amended by a margin of maximum +/- 10%, to protect confidentiality").

- **When the confidential information concerns text, you can either summarize it or eliminate the names of parties by indicating their function.**

Example of **confidential** information:

"TRADING COMPANY Ltd, told me that the prices of imports were 20% lower."

The summary destined for inspection by interested parties could be as follows:

"[One of my customers], told me that the prices of imports were 20% lower.