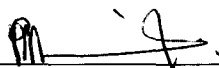


Report No. 168

Investigation into the alleged dumping of unframed glass mirrors of a thickness of 2 mm to 6 mm originating in or imported from India and Indonesia: Final determination

The International Trade Administration Commission of South Africa herewith presents its
**Report No. 168: INVESTIGATION INTO THE ALLEGED DUMPING OF UNFRAMED
GLASS MIRRORS OF A THICKNESS OF BETWEEN 2MM TO 6MM ORIGINATING IN OR
IMPORTED FROM INDIA AND INDONESIA: FINAL DETERMINATION**



Ms N P Maimela
CHIEF COMMISSIONER

PRETORIA
04/07/ 2006

1. APPLICATION AND PROCEDURE

- 1.1 This investigation was conducted in accordance with the International Trade Administration Commission Act, 2002, (the ITA Act), the World Trade Organisation Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade, 1994 (the Anti-Dumping Agreement) and the International Trade Administration Commission of South Africa Anti-Dumping Regulations (ADR).
- 1.2 The application was lodged on behalf of the Southern African Customs Union (SACU) industry by PFG Building Glass (Pty) Ltd, claiming that the dumped imports from Chinese Taipei, India and Indonesia were causing it material injury. PFG Building Glass (Pty) Ltd is the sole manufacturer of unframed glass mirrors in the SACU.
- 1.3 The application was accepted by the International Trade Administration Commission (the Commission) as being properly documented in accordance with Article 5.2 of the Anti-Dumping Agreement on 18 May 2005. The trade representatives of the countries concerned were advised accordingly.
- 1.4 The Commission formally initiated an investigation into the alleged dumping of unframed glass mirror of a thickness of between 2mm and 6mm originating in or imported from Chinese Taipei, India and Indonesia pursuant to Notice No. 780 which was published in *Government Gazette* No. 27 599 on 27 May 2006.
- 1.5 On 23 June 2005, the Commission received a letter from the Applicant requesting that the investigation against Chinese Taipei be terminated. The Applicant indicated that Taiwan Glass Ind. Corp, the biggest glass producer in Chinese Taipei, had offered an undertaking that their mirrors would in future not be exported to SACU at prices below the ex-factory domestic prices in Chinese Taipei.
- 1.6 The Commission considered the request and decided to recommend to the Minister of Trade and Industry that the investigation into the alleged dumping of unframed glass mirrors of a thickness of 2mm to 6mm originating in or imported from Chinese Taipei

be terminated.

- 1.7 The Commission's recommendation was approved by the Minister and the notice to terminate the investigation was published in Notice No. 1580 of *Government Gazette* No 27913 on 26 August 2005.
- 1.8 The investigation period for dumping was from 1 January 2004 to 31 December 2004. The injury investigation involved evaluation of data for the period 1 January 2002 to 31 December 2004.
- 1.9 A producer of the subject product in Indonesia, PT Matahari Silverindo Jaya in Semarang responded fully to the Commission's exporter questionnaire and information submitted was subsequently verified from 30 August 2005 to 02 September 2005.

No complete responses to the Commission's exporters questionnaire were received from the manufacturers of the subject products in India. However, a deficient response was received on time, from Saint-Gobain Glass India Ltd.

- 1.10 McCoy's Glass, an importer of the subject product from Indonesia, responded fully to the Commission's questionnaire and its information was subsequently verified on 18 August 2005.
- 1.11 After considering all information and parties' comments, the Commission made a preliminary determination that the subject product was being dumped on the SACU market and the SACU industry was suffering material injury as a result.
- 1.12 The Commission however, concluded that the SACU industry would not experience material injury as a result of further imports of the subject product from Indonesia during the course of the investigation before it makes its final determination due to the small dumping margin calculated. It therefore decided not to request the Commissioner of South African Revenue Services to impose provisional payments against Indonesia. With regard to India, the Commission was however of the opinion that the industry

would suffer further material injury if provisional payments were not imposed. The Commission therefore requested the Commissioner for South African Revenue Services to impose provisional payments against the subject product originating in or imported from India for a period of twenty-six weeks.

- 1.13 Based on the details as contained in the Commission's preliminary report and the comments received on this report, the Commission made a final decision that it was considering to confirm its preliminary determination that the subject product was being dumped on the SACU market and that the SACU industry was suffering material injury as a result.
- 1.14 The Commission therefore indicated that it was considering making a final determination to recommend to the Minister of Trade and Industry that definitive anti-dumping duties be imposed on the subject products.
- 1.15 The Commission sent out letters to all interested parties, informing them in terms of Section 37 of the International Trade Administration Anti-Dumping Regulations and Article 6.9 of the Anti-Dumping Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade of the "essential facts" which were being considered by the Commission. The Commission invited comments from interested parties on these "essential facts" being considered by the Commission.
- 1.16 After considering all parties' comments in respect of the preliminary determination and the "essential facts" letters, the Commission made a final determination, that the subject product was being dumped on the SACU market and that the SACU industry was suffering material injury as a result.
- 1.17 The Commission, therefore, decided to recommended to the Minister of Trade and Industry that definitive anti-dumping duties be imposed on the subject product originating in or imported from India and Indonesia.

2. PRODUCTS, TARIFF CLASSIFICATION AND DUTIES

2.1 IMPORTED PRODUCTS

2.1.1 Description

The subject products are described as unframed glass mirrors of a thickness of 2mm to 6mm.

2.1.2 Country of origin/export

The subject products are exported from India and Indonesia.

2.1.3 Possible tariff loopholes

No possible tariff loopholes exists.

2.1.4 Other applicable duties and rebates

There are no rebate provisions applicable.

2.1.5 Negligibility test

Table 2.1.5: Import volumes

	Import volumes 1 Jan 2004 to 31 Dec 2004 (POI)	Volume as a percentage of total import volume
Alleged dumped imports:		
India	945 135	31.38%
Indonesia	973 805	32.34%
Other imports	1 092 527	36.28%
Total imports	3 011 467	100%

The import statistics, as contained in the above table, indicate that the volume of dumped imports from India and Indonesia accounted for 31.38 per cent and 32.34 per cent respectively of the total imports of the like product for the period January 2004 to December 2004.

The Commission found that the imports from the subject countries are above the negligibility level.

2.2 SACU PRODUCT

2.2.1 Description

The SACU product is described as “unframed glass mirrors of a thickness of between 2 mm and 6 mm”.

2.3 LIKE PRODUCT ANALYSIS

In determining the likeness of product, the Commission may consider the following criteria:

Table 2.3: Like product determination

	Imported product	SACU product
Raw materials	Float glass, cleaning agent, tin chloride, palladium chloride, silver nitrate, passivator, base coat paint and top paint	Similar to imported products
Physical appearance	The subject products have reflective surfaces on the one side and are painted on the opposite side	Similar to imported products in physical appearance and characteristics
Tariff classification	The imported products are classifiable under tariff subheading 7009.91	Domestic products are classifiable under the same six digit tariff subheading as the imported products
Production process	Cleaning of the glass by washing the top face, spraying on the tin chloride, spraying on the palladium chloride, spraying on the silver nitrate in solution form, application of the passivator chemicals, drying of the glass, application of the base and top coat paint and drying of the coat and baking of the final layer	Production process is similar to the imported products
Application or end use	The subject products are used for general trade mirror merchants, and architectural, domestic and furniture applications	End-use of products sold domestically and those imported are the same
Substitutability	No information was given in this regard	No information was given in this regard

After considering all the above factors and comments received, the Commission was satisfied that the SACU products and the imported products were “like products”, for purposes of comparison in this investigation, in terms of Article 2.6 of the Anti-Dumping Agreement.

3. INDUSTRY STANDING

The Applicant is the sole manufacturer of the product in the SACU. The Application was therefore, supported by 100% of the SACU industry.

The Commission decided that the application could be regarded as being made “by or on behalf of the domestic industry” under the above provisions of the Anti-Dumping Agreement.

4. DUMPING

4.1 METHODOLOGY IN THIS INVESTIGATION FOR SAINT-GOBAIN GLASS IN INDIA

4.1.1 Normal Value

Type of economy

India is considered to be a country with a free market economy and therefore the definition of section 32(2)(b) of the ITA Act applies.

No complete responses to the Commission's exporters questionnaire were received from the manufacturers of the subject products in India. An incomplete response was received on time from Saint-Gobain Glass India Ltd.

According to the deficient information submitted by Saint-Gobain Glass India Ltd, like products to those exported to the SACU area during the period of investigation were sold in the domestic market in India.

In terms of ADR 32.4 if an exporter has submitted an incomplete or otherwise deficient submission by the deadline, the Commission will disregard its information for purpose of its preliminary finding.

The Commission, therefore, made a final finding to base the normal value of India on best information available.

The Commission noted its policy of calculating dumping margins for non-cooperating parties, which are normally calculated by using information in the application.

Furthermore, the Commission found that Saint-Gobain submitted copies of the domestic invoices to which these domestic prices could be verified.

However, the Commission also noted that, in terms of paragraph 7 of Annex II to the Anti-Dumping Agreement, if the authorities have to base their findings, including those with respect to normal value, on information from a secondary source, including the information supplied in the application for the initiation of the investigation, they should do so with special circumspection. In such cases, the authorities should, where practicable, check the information from other independent sources at their disposal, such as published price lists, official import statistics and customs returns, and from the information obtained from other interested parties during the investigation (Own underlining). It is clear, however, that if an interested party does not cooperate and thus relevant information is being withheld from the authorities, this situation could lead to a result that is less favourable to the party than would have been if the party did cooperate.

Based on the above provisions, the Commission made a final determination that best information available was the information obtained from other interested parties(i.e Saint-Gobain) and not information contained in the application.

The Commission, therefore, based the normal value for India on the average price of Saint-Gobain before adjustments.

Export price

According to the exporter, like products to those sold in the domestic market in India were exported to the SACU area during the period of investigation. The export price normally is determined using section 32(2)(a) of the ITA Act (Act 71 of 2002) as a basis.

According to deficient information submitted by the exporter, export sales to SACU were made to Kenross Agencies and Furman Glass Co.

In terms of ADR 32.4 if an exporter has submitted an incomplete or otherwise deficient submission by the deadline, the Commission will disregard its information for purpose of its preliminary finding.

The Commission, therefore, made a final finding to base the export price of India on best information available. Citing the same reasons as in the establishment of the normal value, the Commission decided for purpose of establishing the export price for India, that best information available is the information obtained from other interested parties (i.e. Saint-Gobain) and not information contained in the application.

Dumping margin

When comparing the average normal value (before adjustments) of Saint Gobain with its average export price (after adjustments), a dumping margin of 68.74 per cent was arrived at.

4.2 METHODOLOGY IN THIS INVESTIGATION FOR P.T. MATAHARI SILVERINDO JAYA IN INDONESIA

4.2.1 Normal Value

Type of economy

Indonesia is considered to be a country with a free market economy and therefore the definition of section 32(2)(b) of the ITA Act applies.

Like products to those exported to the SACU area during the period of investigation were sold in the domestic market in Indonesia.

Calculation of normal value

Sales to distributors were used to determine the normal values. The weighted average domestic selling price for various models(thicknesses) was calculated by dividing the total sales values by the total sales volumes for each model.

Weighted average domestic selling prices were calculated for 2mm, 3mm, 4mm, 5mm and 6mm thicknesses.

Adjustments to the normal values

The following adjustments to the normal value, which were verified, were claimed by the exporter. These adjustments were allowed by the Commission as it was satisfied that there were differences in costs between domestic and export sales, which was demonstrated to have affected price comparability at the time of setting the prices:

Credit adjustment

An adjustment was made for the cost of payment terms. The Commission calculated this adjustment based on the standard payment terms and the interest rate applicable for short-term borrowings.

Delivery expense

An adjustment was made for transport and delivery expenses to sales invoiced on a delivered basis.

Packaging

An adjustment was made for packing. The domestic packaging costs per square meter were verified and deducted from the invoiced selling price.

Ex-factory Prices

After taking the above adjustments into consideration the ex-factory domestic selling prices were calculated per thickness.

4.2.2 Export price

Like products to those sold in the domestic market in Indonesia were exported to the SACU area during the period of investigation. The export price was therefore determined using section 32(2)(a) of the ITA Act (Act 71 of 2002) as a basis.

Sales to distributors in SACU were used to determine the export values. The weighted average f.o.b export sales values for the various thicknesses were calculated by dividing the total sales values by the total sales volumes for each thickness.

Weighted average export prices were calculated for 3mm, 4mm, 5mm and 6mm thicknesses.

Adjustment to the export price

The Commission made the following verified adjustments to the f.o.b export prices for purposes of calculating the ex-factory export prices:

Payment Terms

An adjustment was made for the cost of payment terms.

Export packaging

The export packaging costs were verified and deducted from the export price.

Clearing charges

Clearing charges were verified and deducted from the fob export price.

Inland transport

An adjustment was made for transport costs incurred by Matahari Silverindo Jaya in Indonesia to the port of export.

Discounts

An adjustment was made for discount allowed. The amount was verified and deducted from the export price

Ex-factory Prices

After taking the above adjustments into consideration the ex-factory export prices per model were calculated.

4.2.3 Dumping margin

The margin of dumping was determined by comparing the ex-factory normal value for each model with the corresponding ex-factory export prices. The resulting dumping margins were then weighted by the respective export volumes to arrive at the dumping factors. The dumping factors were then added together to arrive at a *de minimis* average dumping margin.

4.3 Residual dumping margin

Since there are other manufacturers of the subject product in Indonesia, the residual dumping margin was calculated. The Commission calculated the residual dumping margin by comparing the highest normal value (per model) before adjustments of the

cooperating exporters to the lowest export price (per model) after adjustments of the cooperating exporters. The resulting dumping margins were weighted by the respective export volumes to arrive at the dumping factors. The dumping factors were then added together to arrive at an average dumping margin of 6.61 per cent.

4.3 CONCLUSION - DUMPING

For purposes of its final determination, the Commission considered all the comments from interested parties and found that the subject product originating in India and Indonesia was being dumped into the SACU market with the following margins:

Table 4.3

Country:	Dumping margins
India: All exporters	68.74%
Indonesia: All exporters excluding those manufactured by PT Matahari Silverindo Jaya	6.61%

5. MATERIAL INJURY

5.1 DOMESTIC INDUSTRY – MAJOR PROPORTION OF PRODUCTION

The following injury analysis relates to PFG Building Glass (Pty) Ltd, the Applicant, the sole manufacturer of the subject product in the SACU.

The Commission made a final determination that this constitutes “a major proportion” of the total domestic production, in accordance with Article 4.1 of the Anti-Dumping Agreement.

5.2 CUMULATIVE ASSESSMENT

It was found in Section 4 of this report that the margin of dumping from each of the countries subject to this investigation is more than *de minimis*. It was further found in paragraph 2.1.5 of this report that the volume of imports from each country is not negligible.

The Commission found that the subject product competes directly with the other imported products and with the SACU manufactured product.

Based on this information, the Commission decided to cumulatively assess the effect of the subject products.

5.3 IMPORT VOLUMES AND EFFECT ON PRICES

Basic Data Set

Year	Unit	Subject Imports	Other imports	Applicant's Production	Inventories	Applicant's sales volumes
2002	Kg	40 321	930 154	100	100	100
2003	Kg	1 492 836	1 245 821	72	57	90
2004	Kg	1 918 940	1 092 527	82	43	74

The information in this table was indexed due to confidentiality using 2002 as the base year.

Examination under Article 3.2

Growth of Subject Imports

Variable	Unit of Measurement	Year			Change
		2002	2003	2004	2002/2004
Subjects imports/domestic production	%	100	51	58	(42)
Subjects imports/domestic consumption	%	100	29	28	(72)

The information in this table was indexed due to confidentiality using 2002 as the base year.

Price Effects of Subject Imports

Variable	Unit of Measurement	Year			Change
		2002	2003	2004	2002/2004
Average import price (fob):	R/unit				
-India		100	1	1	(99)
-Indonesia		100	72	73	(27)
Average price of domestic product (ex-factory) (price depression)	R/unit	100	90	74	(26)
Price undercutting: -Indonesia	R/unit	100	505	116	16
Cost as % of selling price (Suppression)	R/unit	100	118	136	36

The information in this table was indexed due to confidentiality using 2002 as the base year.

The average landed cost of the imported product from Indonesia was calculated on the basis of adding 17 per cent to the CIF values to make provision for customs duty, landing costs, shipping fees, agency documentation and other costs. The 17 per cent is based on actual costs verified at McCoys' Glass.

When comparing the average landed cost of the Indonesian price with the Applicant's average ex-factory price, the Commission found that the price of the Indonesian product was undercutting the Applicant's price by 6.6 per cent.

Price undercutting: India

The average landed price of the imported product from India was calculated on the basis of adding 35.5% to the average unverified FOB value of Saint Gobain to make provision for ocean freight, insurance, customs duties and clearing costs. As no importer responded, the 35.5 per cent was based on information provided by the Applicant.

When comparing the average landed cost of the Indian price with the Applicant's average ex-factory price, the Commission found that the price of the Indian product was undercutting the Applicant's price by 3 per cent.

Price depression

The Applicant's selling prices have been on the decline since 2002 indicating that the Applicant is experiencing price depression.

The Applicant stated that it had to significantly decrease its prices in 2003 and again in 2004, indicating that it is experiencing severe price depression.

Price suppression

The information with regard to price suppression indicates that the Applicant was not able to recover the increases in cost in its selling prices.

5.4 CONSEQUENT IMPACT OF THE DUMPED IMPORTS ON THE INDUSTRY

Examination under Article 3.4

Variable	Unit of Measurement	Year			Change
		2002	2003	2004	2002/2004
Sales:					
In value terms	Rands	100	90	74	(26)
Quantities	Tons	100	93	100	0
Inventories (quantities)	Tons	100	57	43	(57)
Output (quantities)		100	72	82	(18)
Market Share of total SACU	Percentage	100	79	79	(21)
Market share of alleged dumped imports:	Percentage				
-India		0	100	105	5
-Indonesia		100	15	21	(79)
Market share of other imports	Percentage	100	114	92	(8)
Capacity utilization	Percentage	100	72	82	(18)
Employment		100	100	100	0
Wages (total wage bill, monthly average)	Rands	100	97	90	(10)
Productivity (output/worker)	Units per worker	100	72	82	(18)

The information in this table was indexed due to confidentiality using 2002 as the base year except market share of all dumped imports from India where 2003 was used as base year

Variable	Unit of Measurement	Year			Change
		2002	2003	2004	2002/2004
Profit	Rand	100	(43)	(179)	(279)
Cash flow	Rand	100	(46)	(198)	(298)
Return on investment	Percentage	100	(32)	(111)	(211)
Ability to raise capital (capital expenditure)	Rands	100	144	178	78
Growth in SACU market (using 2002 as base year)	Percentage		0	0	0
Growth of Applicant	Percentage		0	0	0
Factors affecting domestic prices (cost of raw material per unit)	Rand/unit				
Magnitude of the margin of dumping India Indonesia	Percentage	68.74% 6.61%			

The information in this table was indexed due to confidentiality using 2002 as the base year.

The Commission made a final determination that the SACU industry is suffering material injury.

5.5 CONCLUSION - MATERIAL INJURY

After considering all relevant factors and taking all comments into account, the Commission made a final determination that the Applicant was suffering material injury in that:

- the dumped imports had increased significantly;
- there was price undercutting;
- it experienced price suppression;
- its output declined;
- its sales declined;
- its profits decreased;
- its market share declined;

- its utilisation of production capacity declined;
- its productivity declined;
- there was a negative effect on its cash flow;
- its return on investment declined;
- its employment declined; and
- there was a negative effect on its growth.

7. CAUSAL LINK

7.1 GENERAL

In order for the Commission to impose final anti-dumping duties, it must be satisfied that there is sufficient evidence to indicate that the material injury experienced by the SACU industry is as a result of the dumping of the subject products.

7.2 VOLUME OF IMPORTS AND MARKET SHARE

An indication of causality is the extent of the increase of volume and the extent to which the market share of the domestic industry has decreased since the commencement of injury, with a corresponding increase in the market share of the dumped product.

The following table compares the market share of the SACU industry with that of the alleged dumped imports:

Table 7.2.1

	2002	2003	2004
Percentage market share held by:			
Total SACU	100	79	79
Alleged dumped imports:			
-India	0	100	105
-Indonesia	100	15	21

The information in this table was indexed due to confidentiality using 2002 as the base year except market share of all dumped imports from India where 2003 was used as base year.

The information illustrates that the Applicant was unable to gain the market share it lost in 2003, while market share of alleged dumped imports from India increased significantly since 2003.

The following table shows the volume of imports:

Table 7.2.1: Import volumes

IMPORT VOLUMES (kg)	2002	2003	2004
India	36	831 339	945 135
Indonesia	40 285	661 497	973 805
Imports from other countries	930 154	1 245 121	1 092 527
Total imports	970 475	2 738 657	3 011 467
Alleged dumped imports as % of total imports			
-India	0.00%	30.36%	31.38%
- Indonesia	4.15%	24.15%	32.34%

The information in the table above indicates that the volume of the dumped imports from India as a percentage of total imports increased from 0 in 2002 to 30.36 percent in 2003 and to 31.38 per cent in 2004.

The volume of the alleged dumped imports from Indonesia as a percentage of total imports increased from 4.15 per cent in 2002 to 24.15 percent in 2003 and to 32.34 percent in 2004.

The information in the table further shows that volume of imports from other countries increased in absolute terms by 17.5 per cent.

7.3 EFFECT OF DUMPED IMPORTS ON PRICES

The following table shows the price effects of the Applicant:

Table 7.3.1: Price undercutting, price depression and price suppression

Rand/unit	2002	2003	2004
Price undercutting (%):			
-Indonesia	100	560	156
Applicant's ex-factory selling price (R/unit)	100	90	74
Cost as a % of selling price (%)	100	118	136

The information in this table was indexed due to confidentiality using 2002 as the base year.

Price undercutting: Indonesia

Price undercutting is the extent to which the landed cost of the imported product is lower than the ex-factory selling price per unit price of the SACU product.

The average landed cost of the imported product from Indonesia was calculated on the basis of adding 17 per cent to the CIF values to make provision for customs duty, landing costs, shipping fees, agency documentation and other costs. The 17 per cent is based on actual costs verified at McCoys Glass.

When comparing the average landed cost of the Indonesian price with the Applicant's average ex-factory price, the Commission found that the price of the Indonesian product was undercutting the Applicant's price by 6.6 per cent.

Price undercutting: India

The average landed price of the imported product from India was calculated on the basis of adding 35.5% to the average unverified FOB value of Saint Gobain to make provision for ocean freight, insurance, customs duties and clearing costs. As no importer responded the 35.5 per cent was based on information provided by

the Applicant.

When comparing the average landed cost of the Indian price with the Applicant's average ex-factory price, the Commission found that the price of the Indian product was undercutting the Applicant's price by 3 per cent.

Price depression

The Applicant's selling prices have been on the decline since 2002 indicating that the Applicant is experiencing price depression.

The Applicant stated that it had to significantly decrease its prices in 2003 and again in 2004, indicating that it is experiencing severe price depression.

Price suppression

The information with regard to price suppression indicates that the Applicant was not able to recover the increases in cost in its selling prices.

7.4 CONSEQUENT IMPACT OF DUMPED IMPORTS

Material injury indicator	Analysis (2002 – 2004)
Sales volume	Decreased
Profit	Decreased
Output	Decreased
Market share	Decreased
Productivity	Decreased
Return on investment	Decreased
Utilisation of capacity	Decreased
Cash flow	Decreased

Inventories	Increased
Employment	Constant
Wages	Decreased
Growth	Decreased
Ability to raise capital	Decreased

7.5 FACTORS OTHER THAN THE DUMPING CAUSING INJURY

7.5.1 Examination of causality under Article 3.5

Variable	Unit of Measurement	Year			Change (%)
		2002	2003	2004	2002/2004
Prices of imports not sold at dumping prices (fob price)	Rands	100	82	259	159
Volume of imports not sold at dumping	Tons	100	134	117	17
Contraction in demand:	Size of the market grew by 27.9% between 2002 and 2004				
• Growth rate for subject product industry	Percentage	100	4	9	(91)
Changes in the patterns of consumption	No information was provided in this regard				
Trade-restrictive practices of foreign and domestic producers	No information was provided in this regard				
Competition between foreign and domestic producers	No information was provided in this regard				
Developments in technology	Technology used in the SACU is the same as the one in India and Indonesia				
Export performance of the domestic industry	Exports have decreased over the period				
Productivity of the domestic industry	Productivity of the Applicant has decreased				

This table was indexed due to confidentiality using 2002 as the base year.

7.6 CONCLUSION ON CAUSAL LINK

After considering all relevant factors and taking all comments into account, the Commission found that there was a causal link between dumped products and the material injury experienced by the SACU industry.

8. SUMMARY OF FINDINGS

8.1 Dumping

The Commission found that the subject product originating in or imported from India and Indonesia was dumped into the SACU market at the following margins:

Exporter	Country of origin	Dumping margin expressed as a percentage of the fob export price
India: All other exporters	India	68.74%
Indonesia (all exporters excluding PT Matahari Silverindo Jaya)	Indonesia	6.61%

8.2 Material injury

The Commission found that the Applicant suffered material injury in the form of price undercutting, price depression, price suppression, decline in profits, decline in output, decline in sales, decline in market share, decline in productivity, negative return on investments, decline in capacity utilisation and negative effect on cash flow.

8.3 Causal link

The Commission considered all the comments received from interested parties and decided that there is a causal link between the dumped products and the material injury suffered by the Applicant.

9. FINAL DETERMINATION

The Commission made a final determination that

- The subject product originating in or imported from India and Indonesia (excluding those manufactured and exported by P.T Matahari Silverindo Jaya) was being dumped into the SACU market;
- The SACU industry suffered material injury;
- The material injury experienced by the SACU industry is causally linked to the dumped imports originating in or imported from India and Indonesia;

The Commission therefore decided to recommend to the Minister of Trade and Industry that definitive anti-dumping duties be imposed on unframed glass mirror of a thickness of between 2mm to 6mm, classifiable under tariff subheading 7009.91, in the following amounts:

Exporter	Rate of anti-dumping duty
India: All exporters	68.74%
Indonesia: All exporters excluding those manufactured by PT Matahari Silverindo Jaya	6.61%