



QUESTIONNAIRE (PETITIONER)

PETITION FOR AN APPLICATION ON SAFEGUARDS INVESTIGATION

Petitioners providing submissions must ensure that:

- **each page is labelled either "confidential" or "non-confidential";**
- **a non-confidential version is provided;**
- **the non-confidential version fully explains the content and significance of the confidential information; and**
- **the declaration is completed.**

**Ministry of International Trade and Industry
Malaysia**

INTRODUCTION

PRODUCT: [*PRODUCT NAME*]

PERIOD OF INVESTIGATION: [*PERIOD*]

For the purpose of this questionnaire submission:

Year 1 : [PERIOD]

Year 2 : [PERIOD]

Period of Injury Determination (POID) : [PERIOD]

STATUTORY REFERENCE:

Safeguards Act 2006

Safeguards Regulations 2007

SUBMIT THE PETITION TO:

DIRECTOR

TRADE PRACTICES SECTION

MINISTRY OF INTERNATIONAL TRADE AND INDUSTRY

LEVEL 9 MENARA MITI

NO.7, JALAN SULTAN HAJI AHMAD SHAH

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GENERAL INSTRUCTIONS

A. For filing the petition

1. Answer questions in the order as presented in the questionnaire. Please ensure that information submitted conforms to the requested format and is clearly labelled.
2. Your reply to this questionnaire may be subjected to verification. Therefore, all worksheets including the source documents used in answering the questionnaire must be retained, for verification during the on-the-spot investigation.
3. To facilitate the verification, please identify the source documents and specify where they are kept. During the verification, you should be prepared to substantiate all information submitted i.e. able to be traced back to regular company documents.
4. It is in your own interest to reply as **accurately** and **completely** to the questionnaire and to **attach supporting documents**. You may supplement your response with additional data not covered by the questionnaire if you believe it is necessary to support your case. If a question does not apply to your company, please write "*not applicable*" and where relevant, state the reason.
5. All documents and source materials submitted **other than in Bahasa Malaysia and the English language must be accompanied by an English translation**. Failure to provide an English translation may result in the information provided being disregarded.
6. For the purpose of replying to this questionnaire, you should use the amounts as recorded in your accounting records.
7. Identify clearly all units of measurement and currencies used in tables and calculations. Apply the same measurements consistently throughout your questionnaire response. You must indicate the source(s) from where the statistical figures are obtained.
8. If you intend to have another party acting on your behalf, please ensure that MITI receives a properly documented power of attorney.
9. Please note that interested parties providing confidential response to the questionnaire are required to furnish non-confidential summaries thereof. In this context, you should be aware that:
 - the non-confidential summaries shall be in sufficient detail to permit a reasonable understanding of the substance of the information submitted in confidence. In exceptional circumstances, such parties may indicate that such information is not susceptible of summary and a statement of the reasons why summarization is not possible must be

provided (Please refer to **Appendix 1** on how to complete the non-confidential version); and

- if it is considered that a request for confidentiality is not warranted and if the supplier of the information is either unwilling to make the information available or to authorise its disclosure in generalised or summary form, such information may be disregarded.

10. You are required to submit:

- five (5) printed copies of the confidential version; and
- three (3) printed copies of the **non-confidential** version.

Clearly mark each version as either “**CONFIDENTIAL**” or “**NON-CONFIDENTIAL**”

11. All information provided to MITI in confidence will be treated accordingly. Your non-confidential version of the submission would be placed in the public file for public viewing.

B. For submitting computerised information

1. It is essential that information be submitted in a computer media. If your company does not maintain records in a computer media or not in a position to submit the requested computerised data, please contact the officials in charge.
2. **Information should be given on any data storage medium compatible with the computer system used by the Government** and provide printouts of all the requested computer files.
3. All data storage medium should be **clearly labelled** with your company's name and file names.
4. The data files have to be compatible to the **MS-EXCEL format**.
5. Please ensure that the submitted data does not contain any virus.
6. Provide the requested files with the structure and column headings as proposed in the respective sections. The order and title of each of the field names, and formulae used in the computer spreadsheets should be maintained.

MINISTRY OF INTERNATIONAL TRADE AND INDUSTRY

Petition for Safeguards Investigation

DECLARATION

I request in accordance with Section 10 of the Safeguards Act 2006 that the Government imposes a safeguard duty, in respect of the products subject to this application.

This application is made on behalf of the Malaysian industry producing like products or directly competitive products, to the imported products which is the subject of this application.

I believe that the information contained in this application:

- provides reasonable grounds for the publication of the notice(s) requested;
and
- is complete and correct.

Signature :

Name :

Position :

Company :

Date :

Company's Official Stamp :

SECTION A : COMPANY STRUCTURE AND OPERATIONS

This section is to provide MITI with an understanding of your company's organisation.

A-1 Identity and Communication

If the petition is submitted by association, list all the members.

Company

Name:

Address:

Telephone:

Facsimile:

Email:

Web page:

Factory

Name:

Address:

Telephone:

Facsimile:

Contact person

Name:

Position/Designation:

Address:

Telephone:

Facsimile:

Email:

A-2 Legal Representative/Consultant

If you have appointed a Legal Representative/Consultant to assist you in this proceeding, provide details of:

Name of Legal Representative/Consultant;

Name of contact person:

Position/Designation:

Address:

Telephone:

Facsimile:



Email:

SECTION B : DOMESTIC INDUSTRY

Domestic industry is defined as:

- the domestic producers as a whole of products which are like or directly competitive with the product under investigation, operating in Malaysia; or
 - the domestic producers operating in Malaysia whose collective output of like products or products directly competitive with the product under investigation constitutes a major proportion of the total domestic production of those products.
1. List the names and contact details of others Malaysian producers of the like products or directly competitive products.
 2. Provide details of any relevant industry association.
 3. Kindly complete Table 1: Total Production of Domestic Industry, the data must:
 - relate to the POID;
 - be provided for all companies in Malaysia producing like products or directly competitive products;
 - comprise production for each type of like products or directly competitive products;
 - explain the basis of any estimates; and
 - show the production volume.

Table 1: Total Production of Domestic Industry

 your data
 calculated data

Type of products	Volume	Percentage
A. Petitioner(s)		
[Company I]		
[Company II]		
B. Companies supporting the application		
[Company III]		

Type of products	Volume	Percentage
[Company IV]		
Total domestic producers who support the application [(A+B)/D]		
C. Companies opposing on the application		
[Company V]		
[Company VI]		
Total domestic producers who opposed to the application (C/D)		
D. Total Malaysian Production (estimated) A+B+C=D		

SECTION C : PRODUCT DESCRIPTION

This section requests a detailed description of the PRODUCT UNDER INVESTIGATION, LIKE PRODUCTS or DIRECTLY COMPETITIVE PRODUCT produce by your company and related company(ies) in Malaysia.

PRODUCT UNDER INVESTIGATION

“Product under investigation” means the class or kind of products imported or sold for importation into Malaysia that is subject of safeguard action, as determined by the Government to be appropriate for establishing the scope of action.

LIKE PRODUCTS

"Like products" means products that are identical or alike in all respects to the product under investigation or, in the absence of such products, another product that although not alike in all respect have characteristics closely resembling the product under investigation.

DIRECTLY COMPETITIVE PRODUCTS

“Directly competitive products” means products that are in competition despite differences in characteristics or composing materials, substitutability in terms of utility purpose or commercial competitiveness.

Provide descriptions and illustrative material (*i.e. brochures, catalogues, specifications, etc.*) for both the locally made and the subject merchandise is required.

C-1 Imported Product Specifications

1. Describe the imported product that defines the requested scope of the investigation, including:
 - a. detailed physical characteristics;
 - b. technical and chemical characteristics;
 - c. technology and manufacturing process involved;
 - d. main raw material/components/inputs used;
 - e. relevant industry’s specifications;
 - f. distribution channels;
 - g. functions and uses; and
 - h. current Malaysian tariff classification and duty rate.

2. Provide detailed description of the like products (locally made products) or directly competitive products including:
 - a. physical characteristics;
 - b. technical and chemical characteristics;
 - c. technology and manufacturing process involved;
 - d. relevant industry's specifications;
 - e. main raw material/components/inputs used;
 - f. distribution channels; and
 - g. functions and uses.

Note:

- Supply technical documentation where appropriate
- If the products involve a number of models and/or types, the details must cover all models or types produced and/or exported

C-2 Customs Classification

1. Provide the following information:

Table 2: Customs Classification

Tariff subheading	Description	Unit of measurement	Rates of customs duty

2. Indicate if you are aware of any loopholes in the tariff classification.

C-3 Domestic Product Specifications

1. Describe in detail your company's own product coding system. Provide a key to your product codes, including all prefixes, suffixes, or other notations, which identify special specifications.
2. Briefly explain the comparability of the product produced by your company with that imported from other countries and note any differences in technical and physical characteristics and end uses.

Table 3: Product Comparability

Types produced by your company <i>(Include codes and description)</i>	Competing types imported <i>(Include codes and description)</i>	Identical <i>(Specify)</i>	Differences <i>(Specify)</i>

SECTION D : PRODUCT UNDER INVESTIGATION

PRODUCT UNDER INVESTIGATION

Please provide:

1. The information on the trend of the import volume of the product under investigation to show the surge of imports.
2. Identify the source countries of the imports into Malaysia in terms of volume and value :
 - during the most recent three years period and during any other recent period that the petitioner believes to be more representative; or
 - if the product under investigation is not imported into Malaysia during the three year period, the information as to the likelihood of the sale of importation into Malaysia of the product under investigation.
3. Factual information and documentary evidence relevant to the increased imports.
4. The names, addresses, contact details (phones/fax/email) of importers who the petitioner believes are importing or are likely to imports.

SECTION E : SERIOUS INJURY

This section provides information on sufficient evidence to reach a reasonable conclusion that the increased imports are causing or threatening to cause serious injury to domestic industry.

SERIOUS INJURY

Serious injury means significant overall impairment in the position of a domestic industry.

It is petitioner's responsibility to fully describe all of the injury claims, including the reasons why it is considered to be serious. It is not sufficient to simply refer to data without an explanation of its relevance to your serious injury claims.

Indicate since when the injury first occurred, from surge of imports commenced, and whether the injury expected to continue. This will determine the investigation period and the extent of the information required in response to other questions in this section.

Provide factual information and documentary evidence relevant to the serious injury.

1. Increased imports

Indicate the rate and amount of the increased imports of the product under investigation in absolute terms and relative to domestic production of like or directly competitive products in Table 4. Analyse the trend, especially where it does not show a regular pattern.

Table 4: Imports

Description	Year 1		Year 2		Year 3	
	Qty	Value (RM)	Qty	Value (RM)	Qty	Value (RM)
Imports (A)						
Domestic Production (B)						
% of imports relative to production (A/B)						

2. Market share

Indicate the share of domestic market of the product under investigation taken by increased imports of such product in Table 5. Analyse the trend, especially where it does not show a regular pattern.

Table 5: Market share

Description	Year 1		Year 2		Year 3	
	Qty	(%)	Qty	(%)	Qty	(%)
Imports (A)						
Domestic Sales (B)						
Total Domestic Market (A+B)						

Explain the market in general - Give a general market outline including details of any segmentation (e.g. brand names versus generic, geographic divisions), historical and expected demand patterns, changes in consumer tastes, distribution channels and seasonal fluctuations.

3. Sales

Indicate the sales of the product under investigation in Table 6. Analyse the trend, especially where it does not show a regular pattern.

Table 6: Sales of Product

Description	Year 1		Year 2		Year 3	
	Qty	Value (RM)	Qty	Value (RM)	Qty	Value (RM)
Domestic Sales (A)						
% change	-	-				
Export Sales (B)						
% change	-	-				
Total Sales (A+B)						

4. Sales Listing

Base on format as per Table 7, provide information on transaction-by-transaction basis relating to sales of product (produced and sold by your company) during the period of injury determination. For this purpose use format as per in Appendix 2, kindly provided in **MS-EXCEL format**.

Table 7: Sales Listing

Field name	Field description	Explanation
NO	Sequence number	Identify each transaction, or line item, in the sales listing, by sequence number (i.e. the first transaction is "1", the second is "2", and so on)
CODE	Company internal	Indicate the code used for the product in your

Field name	Field description	Explanation
	coding system	records
INV-NO	Invoice number	Indicate the invoice number
INV-DT	Invoice date	Indicate the invoice date of the transaction
CUST-NAME	Customer name	Names of your customers
CUST	Customer number	Indicate the customer number used in your records
LEV	Customer level of trade	Use code "1" for end-users, "2" for retailers, "3" for distributors, "4" for others (<i>specify the level</i>)
CUST-REL	Customer Relationship	Used code "R" for related and "U" for unrelated
QTY	Quantity of sales	Provide quantity (specify the unit of measurement) of product sold
GR-VAL	Gross invoice value	Provide the gross invoice value, net of taxes, of product sold
DISC	Discounts	Indicate the discounts deducted on the invoice
NT-VAL	Net invoice value	Provide the net invoice value after the discounts
PAY-TM	Payment terms	Indicate the payment terms agreed with the customer (e.g. 30, 60, 90 days, etc.)
DEL-TM	Delivery terms	Indicate the agreed terms of delivery (e.g. FOB, C&F, CIF, etc.)
DEL-CS	Delivery costs	Indicate the transport costs either as actual costs or as a function of the invoice value (%) or volume (costs per unit)
COMM	Commissions	Indicate any cash discounts, volume discounts, commissions, etc.

5. Credit Notes

Provide details as per Table 8, showing credit notes relating to sales of product (produced and sold by your company) in Malaysian market during period of injury determination on transaction-by-transaction basis. For this purpose use format as per in Appendix 3, kindly provided in **MS-EXCEL format**.

Table 8: Credit Notes

Field name	Field description	Explanation
NO	Sequence number	Identify each transaction, or line item, in the sales listing, by sequence number (i.e. the first transaction is "1", the second is "2", and so on)
CODE	Company internal coding system	As in Table 7: Sales Listing
CRD-NO	Credit note number	Indicate the number of the credit note
CRD-DT	Date of credit note	Indicate the date of the credit note issued
INV-NO	Related invoice number	Ensure that this corresponds where appropriate to the number given in Table 7: Sales Listing

Field name	Field description	Explanation
INV-DT	Related Invoice date	Ensure that this corresponds where appropriate to the date given in Table 7: Sales Listing
CUST	Customer number	As in Table 7: Sales Listing
QTY	Quantity of sales	Provide quantity (specify the unit of measurement) of product credited
VAL	Value credited	Provide the value of product credited

6. Sales Price

- (i) If prices for the product produced in Malaysia are based on price lists, provide the price lists applicable during the investigation period. Explain how these price lists are used to establish the final sales price to the individual customers.
- (ii) If price lists are not used as a basis, explain how and on which basis prices are fixed during sales negotiations. If your salesmen use a standard contract, provide a copy.
- (iii) If you have made purchases of the product which originate in third countries, explain:
 - a. how resale prices are set for these products; and
 - b. how and where these prices fit into the price structure of the products produced by your company.

7. Minimum Profit Required

Please indicate what level of profit, before tax you consider necessary for the product, bearing in mind that it should be sufficient to allow for a normal return, investments and other necessary expenses. Express the level of profit as a percentage of turnover or on any other basis if considered more appropriate. Explain how you arrived to the level of profit stated.

8. Cost to Make and Sell

Please complete Table 9 to show the **actual unit cost to make and sell** for each type of the product. It is necessary to show all the costs associated with the manufacturing and sales of the products with supporting documents. Provide data for each type of product **on quarterly basis for the Period of Injury Determination (POID)**. Please provide a CD /thumbdrive containing the information required encoded in **MS-Excel formats**.

Table 9: Cost to Make and Sell per Unit

COST TO MAKE	Quarter Ended	Quarter Ended	Quarter Ended	Quarter Ended
A. Production Quantity <i>(specify unit of measurement)</i>				
B. Variable Manufacturing Costs Raw materials: - local - imported Direct labour Other <i>(specify)</i>				
C. Fixed Manufacturing Costs				
Depreciation Other mfg. Overheads <i>(specify)</i>				
D. Work In Progress (+) Opening work in progress (-) Closing work in progress				
E. TOTAL COST TO MAKE (B+C+D)				
F. UNIT COST TO MAKE (E/A)				
COST TO MAKE & SELL				
G. Sales Quantity <i>(specify unit of measurement)</i> - Domestic sales of local production <i>(excluding internal transfers)</i> - Export sales of local production				
H. Selling & Distribution Expenses <i>(specify)</i>				
I. Administration & Other Expenses <i>(specify)</i>				
J. Financial Expenses <i>(specify)</i>				
K. TOTAL COST TO SELL (H+I+J)				
L. UNIT COST TO SELL (H+I+J)/G				
M. UNIT COST TO MAKE & SELL (F+L)				

9. Production and Capacity Utilization

Indicate the production and capacity utilization of the product under investigation in Table 10. Analyse the trend.

Table 10: Production and Capacity Utilization

Description	Year 1	Year 2	Year 3
A. Production capacity in units <i>(specify the unit of measurement)</i>			
B. Actual production in units <i>(specify the unit of measurement)</i>			
C. Capacity utilisation (%) $(B/A) \times 100$			

10. Profit and Loss

Prepare separate tables for information on sales transactions to both unrelated and related parties in Malaysia using the format in Table 11 and provide explanation.

Table 11: Profitability

Description	Year 1		Year 2		Year 3	
	Domestic (RM)	Export (RM)	Domestic (RM)	Export (RM)	Domestic (RM)	Export (RM)
Sales						
Less:						
Cost of Sales						
Gross Profit						
Less:						
Selling, General and Administrative Expenses						
Profit/ (Loss)						
Other Income/ (Expense)						
Net Profit						

11. Cash Flow

Indicate the cash flow of the product under investigation in Table 12. Analyse the trend, especially where it does not show a regular pattern.

Table 12: Cash Flow Statement for the Product

CASH FLOW STATEMENT	Year 1 (RM)	Year 2 (RM)	Year 3 (RM)
Operating Income			
Adjustment to reconcile net income to net cash provided by operating activities:			
Depreciation and amortization			
Changes in other accounts affecting operations:			
(Increase)/ decrease in accounts receivable			
(Increase)/ decrease in inventories			
(Increase)/ decrease in prepaid expenses			
Increase/ (decrease) in account payable			
Increase/ (decrease) in taxes payable			
Others (specify)			
Net cash provided by operating activities			

Provide copies of trading, profit and loss statement of the like products or for the narrowest group or range of products which includes the 'like product' for the period commencing from the financial year prior to the start of injury to the current financial period. Provide your annual report and audited accounts for the previous three year

12. Productivity

Indicate the productivity of the product under investigation in Table 12. Analyse the trend.

Table 12: Productivity

Description	Year 1	Year 2	Year 3
	Qty	Qty	Qty
Production of PUI			
No of employee involved in production of PUI			
Machine hours used			
Productivity level (%)			

13. Employment

Indicate the total personnel employed in Table 13. Analyse the trend.

Table 13: No of Employees

Description	Year 1	Year 2	Year 3
Personnel employed in the production process of PUI			
Personnel employed in the production process of other products			
Personnel employed in the sales, general and administration			
Total Personnel			

If it is not possible to attribute the number of persons employed directly to the product, allocation should be made. Explain basis of the allocation.

14. Wages

Indicate the employees' wages rate in Table 14. Analyse the trend.

Table 14: Wages

Description	Year 1 (RM)	Year 2 (RM)	POI (RM)
A. Wages			
B. Cost of social benefits			
C. Total labour costs (A+B)			

Analyse the trends. Explain if:

- workers have been temporarily out of work; and
- You had to introduce reduced working hours

SECTION F : THREAT OF SERIOUS INJURY

THREAT OF SERIOUS INJURY

Threat of serious injury means serious injury that is clearly imminent. In determining whether increased imports threaten to cause serious injury to a domestic industry, these following factors need to be evaluated.

F-1 Exports Capacity

Indicate the actual and potential export capacity of the country of production or origin.

F-2 Inventory

1. Indicate if there is any build up of domestic inventory.
2. Indicate if there is any build up of exporting country inventory.

F-3 Future Exports Probability

Indicate the probability the exports of the product under investigation will enter the domestic market in increasing quantities.

F-4 Other Injury Factors

Additional injury indicators may include:

- forward orders and stocks
- return on investment
- ability to raise capital
- investment

1. Are there any additional injury indicators yet to be addressed? Please list and comment on the effect in detail for the period of investigation.
2. Any other factors deemed relevant by the Government.
3. Provide factual information and documentary evidence relevant to the serious injury.

SECTION G : CAUSAL LINK

CAUSAL LINK

Petitioners have to demonstrate the presence of surge of imports and serious injury or threat of serious injury. Of equal importance is the need to show that a causal link exist between the imports and the serious injury or threat of serious injury e.g. evidence of particular sales lost or a direct relationship between increased imports and reduced sales of the locally produced merchandise.

Question 2 requires identification and analysis of factors other than the surge of imports which may also be contributing to the injury suffered by the domestic industry. The injury caused by other factors must not be attributed to the dumped or subsidised goods.

1. Explanation on the causal link between increased imports and serious injury or threat of serious injury to the domestic industry.
2. Please outline your arguments in support of a causal link between surge of imports and injury.
3. Describe in details the extent to which the injury may be attributed to factors such as:
 - seasonal fluctuations,
 - the volume and price of imports from other countries;
 - general economic conditions including changes in customer preference, plant shutdowns, industrial disputes;
 - developments in technology
 - quality differences between the locally made and the imported products;
 - competition between foreign and Malaysian producers; and
 - the exports performance and productivity of the domestic industry.

Please indicate any other factors which are important in your view.

SECTION H : UNFORESEEN DEVELOPMENT

UNFORESEEN DEVELOPMENT

Any development which led to a product being imported in increased quantities and under such conditions as to cause or threaten to cause serious injury to domestic producers must have been “unexpected”

Please demonstrate:

1. Explanation on unforeseen developments that have resulted in increased imports causing or threatening to cause serious injury to domestic industry.
2. Global scenario in terms of prices, market demand and export trend.

SECTION I : ADJUSTMENT PLAN

ADJUSTMENT PLAN

Measures adopted to generate conditions to overcome the lack of competitiveness of a particular industry before the presence of imports. These measures can include, for example, re-structuring of a plant, training of employees, acquisition of new technologies, introduction of more efficient production processes, among others.

Please outline:

1. The adjustment plan for the duration of the proposed imposition of definitive safeguard measure and the proposed relief measures allowing domestic industry to recover its competitiveness.
2. A necessary effort to be taken by domestic industry to enable them to compete successfully with imports after measure is terminated.

SECTION J : PUBLIC INTEREST

You may wish to provide comments on the Malaysian market trends generally and/or any other factors you consider relevant to the claims of material injury.

It should be noted that any comments you make at this point must be supported by factual and documentary evidence at the time of submission and also available in a non-confidential form if they are to be taken into account by MITI.

J-1 Malaysian Market

Provide a general outline and trends of the Malaysian market from your perspective and provide comments on any other factors you believe affect the Malaysian industry such as supply and demand, prices, the relative importance of imports, etc.

J-2 Effect of Continued Imports

What would happen to your business and the market in general if the imports of product were to continue in their current trend without corrective measures being taken by the institutions of Malaysia? Explain the reasons for your view.

CHECKLIST

The purpose of the following checklist is to ensure that you have answered all questions in section A to section I and to permit a quick survey on information, which may be missing. Tick the box where complete information is submitted or where information has not sufficiently been provided:

Section	<i>Tick If Complete Information Is Submitted</i>	<i>Tick If Information Is Not Or Insufficiently Submitted</i>
Section A: Company Structure and Operations		
Section B: Domestic Industry		
Section C: Product Description		
Section D: Imports of Product Under Investigation		
Section E: Serious Injury		
Section F: Threat of Serious Injury		
Section G: Causal Link		
Section H: Unforeseen Development		
Section I: Adjustment Plan		
Section J: Public Interest		

Guidelines on How to Complete the Non-Confidential Version

1. All non- confidential submission will be made available in public file for viewing only.
2. When completing the non-confidential submission you should bear in mind that all exporters, importers, Malaysian domestic producers and other interested parties will have access to it. The non-confidential submission should be sufficiently details to permit a reasonable understanding of the substance of the information submitted in confidence.
3. In order to assist you in completing the non-confidential submission we advise you to:
 - a. Use the completed confidential questionnaire response as a basis. Identify all information in the confidential response, which you consider is not confidential, and copy it to the non-confidential version.
 - b. After this, check once more whether the information you did not copy to the non-confidential response is really confidential. If you still consider it to be confidential, summarise the confidential information in non-confidential form. If, in exceptional circumstances, it is not possible to even summarise the confidential information, give reasons, why summarisation is not possible.
 - c. If the authorities find that a request for confidentiality is not warranted and if the supplier of the information is either unwilling to make the information public or to authorise its disclosure in generalised or summary form, the authorities may disregard such information unless it can be demonstrated to their satisfaction from appropriate sources that the information is correct.
4. Example on how to summarise confidential information:
 - a. When the information concerns numbers for various years, you can use indices.

Example of confidential information:

Year 1	Year 2	POI
RM 20,000	RM 30,000	RM 40,000

The non-confidential summary could be:

Year 1	Year 2	POI
100	150	200

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

Example of confidential figure:

“Cost of production is RM 300 per tonne.”

The non-confidential summary could be:

“Cost of production is RM330 per tonne” (+ footnote saying: actual number have been amended by a margin of maximum \pm 10%, to protect confidentiality”)

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

Example of confidential information:

“TRADING COMPANY LTD, stated that the prices of imports were 20% lower.”

The non-confidential summary could read:

“(one of the customers), stated that the prices of imports were 20% lower.”

