

GECEX Resolution No. 831, of December 19, 2025

Extends the definitive antidumping duty, for a period of up to five years, applied to Brazilian imports of new rubber tires for passenger cars originating from Thailand and Chinese Taipei, with immediate suspension after its extension for Chinese Taipei.

The Executive Management Committee of the Foreign Trade Chamber, in the exercise of the powers conferred upon it by Article 6, item VI, of Decree No. 11,428, of March 2, 2023; considering the provisions of Article 2, item I, of Decree No. 8,058, of July 26, 2013; as well as considering the information, reasons and grounds present in the Single Annex to this resolution and in SEI Opinion No. 1746/2025/MDIC, and as decided in its 232nd Ordinary Meeting, held on December 18, 2025, resolve:

Article 1. Extends, for a period of up to five years, the application of the definitive antidumping duty to Brazilian imports of new rubber tires for passenger cars, of radial construction, of the 65 and 70 series, 13" and 14" rims and 165, 175 and 185 treads, commonly classified under subheading... 4011.10.00 of the Mercosur Common Nomenclature - NCM, originating from Thailand and Chinese Taipei, to be collected in the form of a specific rate fixed in US dollars per kilogram, in the amounts specified below:

Origin	Producer / Exporter	Definitive Antidumping Law (US\$/kg)
Thailand	Sumitomo Rubber (Thailand) Co. Ltd.	1.32
Thailand	Svizz-One Corporation Ltd.	1.35
Thailand	Other producers/exporters Chinese	1.35
Taipei*	All producers/exporters*	1.43*

\*Extension with immediate suspension, pursuant to article 109 of Decree No. 8,058 of 2013.

Sole paragraph. The tariff classification referred to in **the heading** is merely indicative, not having any binding effect with respect to the scope of the antidumping measure.

Article 2. Suspends the application of the antidumping duty to Chinese Taipei immediately after its extension, due to doubts regarding the likely future evolution of imports of the product subject to the antidumping duty, pursuant to Article 109 of Decree No. 8,058, of July 28, 2013, as justified in item 8 of the Single Annex.

§ 1 The collection of the duty shall be immediately resumed if the increase in imports occurs in a volume that may lead to a recurrence of the injury, as provided for in the sole paragraph of article 109 of Decree No. 8,058 of 2013, after analysis of the behavior of these imports, to be carried out by means of a petition submitted in accordance with current legislation.

§ 2. If submitted, the petition with supporting evidence must contain import data relating to the entire period that has elapsed since the date of publication of the extension of the right, covering at least a period of six months, in order to constitute a reasonable period for the analysis of its behavior.

Article 3. Makes public the facts that justified the decisions contained in this Resolution, as set forth in the Single Annex.

Article 4. This Resolution shall enter into force on the date of its publication.

SINGLE ANNEX

1. BACKGROUND

1.1. From the original investigation

1. On December 29, 2011, the National Association of the Tire Industry, hereinafter Anip, or the petitioner, filed a petition with DECOM to initiate a dumping investigation in Exports to Brazil of new rubber tires for passenger cars, originating from Korea. from the South, from Thailand, from Chinese Taipei and from Ukraine, and from damage to the domestic industry resulting from such practice. The investigation was initiated through SECEX Circular No. 34, dated July 19, 2012, published in Official Gazette of the Union (DOU) on July 20, 2012.

2. By means of CAMEX Resolution No. 1, of January 15, 2014, published in the Official Gazette on 16 In January 2014, the aforementioned investigation was concluded with the application of antidumping duties. considering the positive finding of dumping and the resulting injury from such practice. Antidumping law The final amount was applied in the amounts specified in the following table:

Antidumping Law Applied - **Other Origins**

Origin:	Producer/Exporter	Antidumping duty (US\$/kg)
South Korea, Hankook Tire Co. Ltd.		0.24
	Kumho Tire Co. Inc.	0.61
	Nexen Tire Corporation	0.14
	Too much	2.56
Thailand	Sumitomo Rubber (Thailand) Co. Ltd. 1.32	
	Svizz-One Corporation Ltd.	1.35
	Too much	1.35
Chinese Taipei All		1.43
Ukraine	All	1.23



Source: CAMEX Resolution No. 1/2014.

Prepared by: DECOM.

1.2. From the first review

3. On September 13, 2018, ANIP filed, through the then DECOM Digital System (SDD), petition to initiate end-of-period review with the aim of extending the antidumping duty applied to Brazilian imports of new rubber tires for passenger cars, originating From South Korea, Thailand, Chinese Taipei, and Ukraine to Brazil.

4. This review was initiated by means of SECEX Circular No. 1, dated January 15, 2019, published

Published in the Official Gazette of the Union (DOU) on January 16, 2019.

5. By means of GECEX Resolution No. 3, of January 14, 2020, published in the Official Gazette on 16 In January 2020, the first review of the antidumping duty for the aforementioned origins was concluded. extending the application of the definitive antidumping duty, for a period of up to 5 (five) years, to Brazilian imports of new rubber tires of the types used in passenger cars, radial construction, from the 65 and 70 series, 13" and 14" rims, and 165, 175 and 18" bands, commonly classified in item 4011.10.00 of the Mercosur Common Nomenclature (NCM), originating from the Kingdom of Thailand, Republic of Korea and Chinese Taipei.

6. The definitive antidumping duty, to be collected in the form of a specific rate set in US dollars per kilogram, has been extended in the amounts specified below:

Definitive Antidumping Law

Origin	Producer / Exporter	Definitive Antidumping Law (US\$/kg)
South Korea Hankook Tire Co. Ltd.		0.24*

	Kumho Tire Co. Inc.	0.61*
	Nexen Tire Corporation	0.14*
	Other producers/exporters	2.56*
Thailand	Sumitomo Rubber (Thailand) Co. Ltd. 1.32	
	Svizz-One Corporation Ltd.	1.35
	Other producers/exporters	1.35
Chinese Taipei	All producers/exporters 1.43	

Prepared by: DECOM.

\*Extension with immediate suspension, pursuant to article 109 of Decree no. 8,058 of 2013. —

7. It is noted that the same Resolution No. 3/2020 suspended the application of the right.

Antidumping measures against South Korea will be imposed immediately following their extension, due to the existence of doubts regarding the likely future evolution of imports of the product subject to antidumping duties, in terms of article 109 of Decree No. 8,058/2013 - hereinafter also referred to as the Brazilian Regulation, as justified in item 10 of Annex I of GECEX Resolution No. 3/2020.

8. It should be mentioned that the aforementioned antidumping measure was not extended to the Ukraine, pursuant to Circular No. 2, of January 15, 2020, published in the Official Gazette on January 16, 2020, since there was no evidence of the likelihood of a resumption of dumping in exports. From Ukraine to Brazil, new rubber tires of the type used in passenger cars, radial construction, from the 65 and 70 series, 13" and 14" rims, and 165, 175 and 185 bands, commonly classified in code 4011.10.00 of the Mercosur Common Nomenclature (NCM), and the damage to the domestic industry. resulting from such practice, should the antidumping measure in question be terminated, in accordance with Article 106 of Decree No. 8,058 of 2013.

1.3. South Korea as an investigated origin

9. In the petition to initiate the end-of-period review, Anip submitted a statement to with respect to the trade defense measure applied to imports of automobile tires originating from Republic of Korea.

10. Anip highlighted the history of the suspension of the measure for the origin mentioned above in the terms of article 109 of Decree No. 8,058/2013. He also commented that he submitted it on July 29, 2024. request for reapplication of the antidumping duty, through SEI Process No. 19972.001629/2024-93, "Given the observed increase in imports from Korea and considering the already proven..." "The likelihood of resuming dumping and causing injury from that source," in the petitioner's words.

11. According to Anip, the suspension would not prevent the end-of-period review from taking place, since It would be necessary to assess whether the conditions that justified the application of the measure would still remain valid.

12. Thus, the petitioner requested the reapplication of the measure and that it remain in effect. during the end-of-period review, given the significant increase in imports from South Korea after the Suspension of the measure and the high probability of resuming dumping.

13. DECOM notes that GECEX Resolution No. 3/2020 suspended the application of law. antidumping measures applied to Brazilian imports of new rubber tires, commonly classified in item 4011.10.00 of the Mercosur Common Nomenclature, originating from the Republic of Korea immediately after its extension, due to doubts regarding the likely evolution of the situation. future imports of the product subject to antidumping duties, pursuant to Article 109 of Decree No. 8.058/2013, as justified in item 10 of Annex I of GECEX Resolution No. 3/2020.

14. During the period in which the antidumping duty was suspended, imports originating South Korea's evolution was as follows:

Total Imports (in tons) —————						
[RESTRICTED]						
	P1	P2	P3	P4	P5	P1-P5
South Korea	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	6706.0%	5.9%	26.8%	-61.0%	+3.467%



Source: RFB
Prepared by: DECOM

15. From P1 to P2, there was significant growth of 6,706%, considering the low initial volume.

In period P1, increases in import volume were also noted from P2 to P3 and from P3 to P4: 5.9% and 26.8%, respectively. From P4 to P5, a decrease of 61% was observed. When considering the extremes of the periods, there was a growth of 3,467%.

16. When comparing the volume of South Korean imports with total Brazilian imports during the analysis period, it can be seen that the former represented 0.03%; 2.5%; 2.4%; 1.7% and 0.5%, respectively, of the total of these imports.

17. When compared to the Brazilian market, the share of South Korean imports of automobile tires reached the following percentages in each analysis period: 0.001%; 0.3%; 0.4%; 0.5% and 0.2%, respectively.

18. Based on the data presented, it was observed that the significant growth from P1 to P2 did not continue in the same magnitude or in a relevant proportion throughout the analysis period, even showing a 61% drop from P4 to P5. The highest proportion of total imports was in P2, reaching 2.5%. Regarding the Brazilian market, the highest representation was reached in P4, when it accounted for 0.5%.

19. In this context, five years after the antidumping duty was suspended, it was observed that the volume imported from the aforementioned origin represented insignificant shares of both total Brazilian imports and the Brazilian market, and the sole paragraph of Article 109, which states that "The collection of the duty will be immediately resumed if the increase in imports occurs in a volume that could lead to a resumption of the injury," was not triggered.

20. Thus, when analyzing the review petition, DECOM understood that, after the five years of suspension of the measure and given the evolution of the volume of imports from South Korea, the doubts regarding the future evolution of imports of the product subject to the right originating from that country had been dispelled.

21. Regarding Anip's statement on the aforementioned topic, DECOM emphasizes that no significant increase in imports from South Korea in volume that could lead to a resumption of the damage, as per article 109, was proven during the analyzed period.

22. Furthermore, it should be mentioned that, on November 12, 2024, Anip filed a statement withdrawing its request to reapply the suspended antidumping measure to South Korea, as per SEI Process No. 19972.001629/2024-93. The withdrawal request was approved by DECOM through SEI Official Letter No. 8045/2024/MDIC on November 25, 2024.

23. Given the lack of a significant increase in the volume of automobile tire imports from South Korea and the low representativeness of the imported volume in relation to the total imported and the Brazilian market, even five years after the suspension of the antidumping duty applied to imports from that country, it was considered that there was no probability of a resumption of the injury, since, during the period of suspension of the measure, no significant volume of imports from this origin was verified during the period that the duty remained suspended.

24. Therefore, no end-of-period review was initiated regarding the antidumping duty that was in effect at the time, and this duty was terminated.

**1.4. Investigation concerning exports of automobile tires originating from China**

25. On January 9, 2008, ANIP filed a petition on behalf of its members Goodyear do Brasil Produtos de Borracha Ltda., Bridgestone do Brasil Ind. e Comércio Ltda., and Pirelli Pneus Ltda., requesting an investigation into dumping in exports from the People's Republic of China to Brazil of new rubber tires for passenger cars, radial construction, series 65 and 70, rims 13" and 14" and treads 165, 175 and 185, and of injury to the domestic industry resulting from such practice.

26. The investigation was initiated by means of SECEX Circular No. 46, of July 8, 2008, published in the Official Gazette of July 10, 2008, and was concluded by means of CAMEX Resolution No. 49, of September 8, 2009, published in the Official Gazette of September 9, 2009, with the application of the law for 5 years.





definitive antidumping duty in the form of a specific rate of US\$ 0.75/kg on imports of the product in question.

27. CAMEX Resolution No. 49 of 2009 itself also established the suspension, for up to six months from the date of its publication, from the application of the aforementioned antidumping duty to passenger vehicle manufacturers, taking into account the national interest expressed in the policy Government incentive program to encourage the purchase of popular automobiles, through a reduction in the tax on... Industrialized Products (IPI).

1.4.1. From the first revision (China)

28. On December 28, 2011, ANIP, on behalf of its associates Goodyear of Brazil Rubber Products Ltd., Bridgestone Firestone of Brazil Industry and Commerce Ltd., Michelin Society de Participação, Indústria e Comércio Ltda. and Pirelli Pneus SA filed a request for review of the right antidumping measures applied to imports of automobile tires originating from China, based on Article 58 of Decree No. 1,602 of 1995, since the law in force would not be effective in annulling the harmful effects resulting from the practice of dumping.

29. The aforementioned review was initiated by means of SECEX Circular No. 39, dated August 23, 2012. Published in the Official Gazette of the Union on August 24, 2012, and corrected on August 29, 2012, and September 12, 2012. 2012. The review was initiated in the third year after the application of the law and, considering the legal deadline of With twelve months until its completion, any eventual change to the law would occur after four years have already passed. of the application of the original law. In this scenario, such a change in the law would remain in effect for approximately only one year, since Article 57 of Decree No. 1,602 of 1995 established that all antidumping duties The definitive law would expire at most five years after its implementation. In order to circumvent such Due to limitations, the review of the antidumping duty was initiated under paragraph 1 of article 57 of Decree No. 1,602, of 1995.

30. On July 29, 2013, Resolution CAMEX No. 56, of July 24, was published in the Official Gazette. 2013, which extended, for up to five years, the antidumping duty applied to Brazilian imports of New car tires originating from China in the following amounts:

Definitive Anti-dumping Law - China

Producer/Exporter GITI	Antidumping duty (US\$/kg)
Radial Tire (Anhui) Company Ltd.	1.31
Shandong Jinyu Industry Co. Ltd.	1.08
Shandong Yongsheng Rubber Group Co. Ltd.	1.30
South China Tire & Rubber Co. Ltd.	2.17
Apollo International FZC	1.54
Beijing Capital Tire Co., Ltd.	1.54
Cheng Shin Tire & Rubber (China) Co. Ltd.	1.54
Cooper Chengshan (Shandong) Tire Company Ltd.	1.54
Double Coin Holding Ltd.	1.54
Federal Tire (Jiangxi) Ltd.	1.54
Goodfriend Tyres Co., Ltd.	1.54
Guangzhou Bolex Tyre Ltd.	1.54
Hangzhou Zhongce Rubber Co., Ltd.	1.54
Kenda Rubber Co., Ltd.	1.54
Kumho Tire (Chang Chun) Co., Inc.	1.54
Kumho Tire (Tianjin) Co., Ltd.	1.54
Kumho Tire Co., Inc.	1.54
Kumho Tire (Nanjing) Co. Ltd.	1.54
Liaoning Permanent Tire Co. Ltd.	1.54
Pneuma Overseas Co. Ltd.	1.54
Qingdao Cenchelyn Tire Co., Ltd.	1.54
Qingdao Jianfu Tire Co., Ltd.	1.54
Sailun Co., Ltd.	1.54



Shandong Changfeng Tire Co., Ltd.	1.54
Shandong Fenglun Tire Co., Ltd.	1.54
Shandong Guofeng Rubber Co., Ltd.	1.54
Shandong Hengfeng Rubber & Plastic Co., Ltd.	1.54
Shandong Linglong Rubber Co., Ltd.	1.54
Shandong Linglong Tire Co., Ltd.	1.54
Shandong Shuangwang Rubber Co., Ltd.	1.54
Shandong Yongtai Chemical Group Co., Ltd.	1.54
Shengtai Group Co., Ltd.	1.54
Sichuan Tire & Rubber Co. Ltd.	1.54
Triangle Tyre Co., Ltd.	1.54
Zhao Qing Junhong Co., Ltd.	1.54
Other companies	2.17

Source: CAMEX Resolution No. 56, of July 24, 2013.

Prepared by: DECOM.

1.4.2. From the second revision (China)

31. On March 28, 2018, ANIP, on behalf of its members Bridgestone, Continental and Pirelli has filed a request for review of the antidumping duty applied to tire imports. automobiles originating from China.

32. The second review was initiated by means of SECEX Circular No. 32, dated July 26, 2018. Published in the Official Gazette of the Union on July 27, 2018. During the review, it was demonstrated that the extinction of antidumping duties applied to Brazilian imports of automobile tires originating from China. This would most likely lead to the continuation of dumping and a resumption of damage to its domestic industry. resulting.

33. Thus, through the publication of SECINT Ordinance No. 505, of July 23, 2019, published In the Official Gazette of July 25, 2019, the extension of the antidumping duty was determined, in the form of a specific rate fixed in US dollars per ton, in the amounts specified below:

Definitive Anti-dumping Law - China

Producer/Exporter	Antidumping Law (US\$/kg)
GITI Radial Tire (Anhui) Company Ltd, GITI Tire (Fujian) Company Ltd., GITI Tire (Hualin) Company Ltd. and GITI Tire Global Trading Pte. Ltd. (GTT).	1.25
Shandong Linglong Tire Co., Ltd.	1.54
Zhongce Rubber Group Co., Ltd.	1.54
Shandong Changfeng Tires Co., Ltd.	1.29
Shandong Haohua Tire Co., Ltd.	1.29
Shandong Longyue Rubber Co., Ltd.	1.29
Shaanxi Yanchang Petroleum Group Rubber Co. Ltd.	1.29
Shandong Hengfeng Rubber & Plastic Co., Ltd.	1.29
Triangle Tyre Co., Ltd.	1.29
Zhaoqing Junhong Co Ltd	1.29
Kumho Tire Tianjin Co Inc	1.29
Shandong Huasheng Rubber Co., Ltd.	1.29
Sailun Group Co., Ltd.	1.29
Shandong Yogntai Group Co. Ltd.	1.29
Other companies	1.77

Source: SECINT Ordinance nº 505/2019.

Prepared by: DECOM.

1.4.3. From the third revision (China)

34. On April 1, 2024, Anip, on behalf of its associates Continental do Brasil Produtos Automotivos Ltda., Bridgestone do Brasil Indústria e Comércio Ltda., and Pirelli Pneus Ltda., filed, at Electronic Information System of the Ministry of Development, Industry, Commerce and Services (SEI), Petition to initiate a review at the end of the period of the antidumping duty applied to tire imports. New radial rubber tires for passenger cars, 65 and 70 series, 13" and 14" rims. and bands 165, 175 and 185, originating in China, commonly classified under subheading 4011.10.00 of Common Nomenclature of Mercosur (NCM), pursuant to SECINT Ordinance No. 505/2019.

35. This review was initiated by means of SECEX Circular No. 35, dated July 24, 2024, published Published in the Official Gazette of the Union (DOU) on July 25, 2024. During the review, it was demonstrated that the extinction of rights antidumping measures applied to Brazilian imports of automobile tires originating from China, very This would likely lead to continued dumping and renewed damage to its domestic industry. resulting.

36. Thus, through the publication of GECEX Resolution No. 744, of July 3, 2025, published In the Official Gazette of July 4, 2025, the extension of the antidumping duty was determined, in the form of a specific rate fixed in US dollars per ton, in the amounts specified below:

Definitive Anti-dumping Law - China

Producer/Exporter	Antidumping Law (US\$/kg)
GITI Radial Tire (Anhui) Company Ltd, GITI Tire (Fujian) Company Ltd., GITI Tire (Hualin) Company Ltd. and GITI Tire Global Trading Pte. Ltd. (GTT).	1.25
Shandong Linglong Tire Co., Ltd.	1.54
Zhongce Rubber Group Co., Ltd.	1.54
Shandong Changfeng Tires Co., Ltd.	1.29
Shandong Haohua Tire Co., Ltd.	1.29
Shandong Longyue Rubber Co., Ltd.	1.29
Shaanxi Yanchang Petroleum Group Rubber Co. Ltd.	1.29
Shandong Hengfeng Rubber & Plastic Co., Ltd.	1.29
Triangle Tyre Co., Ltd.	1.29
Zhaoqing Junhong Co Ltd	1.29
Kumho Tire Tianjin Co Inc	1.29
Shandong Huasheng Rubber Co., Ltd.	1.29
Sailun Group Co., Ltd.	1.29
Shandong Yogntai Group Co. Ltd.	1.29
Other companies	1.77

Source: GECEX Resolution No. 744/2025.

Prepared by: DECOM.

2. OF THE PRESENT REVIEW

2.1. Regarding the petition

37. On September 13, 2024, ANIP, on behalf of its Continental Brazil associates Automotive Products Ltd. (hereinafter "Continental"), Bridgestone do Brasil Indústria e Comércio Ltda. (hereinafter "Bridgestone") and Pirelli Pneus Ltda. (hereinafter "Pirelli"), filed, in the Electronic System of Information from the Ministry of Development, Industry, Trade and Services (SEI), petition for commencement of end-of-period review of the antidumping duty applied to Brazilian imports of new tires. Rubber tires for passenger cars, radial construction, 65 and 70 series, 13" and 14" rims, and bands. 165, 175 and 185, commonly classified under subheading 4011.10.00 of the Mercosur Common Nomenclature. (NCM), originating from South Korea, Thailand and Chinese Taipei, under the terms of SECINT Ordinance No. 505/2019

38. On December 9, 2024, through Official Letter No. 8375/2024/MDIC, a request was made to The petitioner is requested to provide supplementary information to that contained in the petition, based on Section 2 of Article 41 of Decree No. 8,058, of July 26, 2013. The petitioner, after requesting an extension, This information was presented in a timely manner on December 23, 2024.



39. Thus, the detailed information in this document takes into account the original petition and supplementary information submitted.

2.2. From the beginning of the review

40. Having verified the existence of sufficient elements indicating that the termination of the antidumping duty applied to the aforementioned imports would very likely lead to the continuation or resumption of dumping and the resulting injury to the domestic industry, Opinion DECOM No. 174, dated January 15, 2025, was prepared, proposing the commencement of a review of the antidumping duty in force.

41. Thus, based on the aforementioned opinion, the present review was initiated by means of SECEX Circular No. 3, of January 15, 2025, published in the Official Gazette of January 16, 2025. In accordance with the provisions of § 2 of Article 112 of Decree No. 8,058 of 2013, while the review is ongoing, the antidumping duty remains in force.

2.3. Of the stakeholders

42. In accordance with paragraph 2 of article 45 of Decree No. 8,058 of 2013, they were identified as The interested parties, in addition to the petitioner, are the producing companies that make up the domestic industry and other national producers, Chinese producers/exporters, Brazilian importers of the product subject to the antidumping duty, and the Government of Thailand and Chinese Taipei.

43. In compliance with the provisions of Article 43 of Decree No. 8,058 of 2013, the companies producing/exporting and importing the product subject to the antidumping duty during the continuation/resumption of injury review period were identified using detailed data on Brazilian imports provided by the Special Secretariat of the Federal Revenue of Brazil (RFB), of the Ministry of Finance.

44. [RESTRICTED].

2.4. Notifications of commencement and requests for information from the parties

45. In accordance with the provisions of Article 96 of Decree No. 8,058 of 2013, the investigating authority notified, in addition to the petitioner, the national producers not represented in the petition, the producers/exporters from the origins subject to the antidumping duty now under review, and the Brazilian importers – identified through official import data provided by the Brazilian Federal Revenue Service (RFB) – of the commencement of the investigation.



46. Furthermore, the aforementioned notifications included the electronic address where a copy of the SECEX Circular that initiated the review could be obtained. The notifications to the governments and to the producers/exporters and importers who traded the product during the period of continuation/resumption of dumping were sent on January 23, 2025.

47. The producers/exporters identified by the Department and the governments of the investigated origins were provided with the email address where the full, non-confidential text of the petition that gave rise to the review, as well as its supplementary information, could be obtained.

48. Furthermore, as provided for in Article 50 of Decree No. 8,058 of 2013, the electronic addresses where the respective questionnaires could be obtained were sent to the producers/exporters and importers in the same notifications, with a return period of thirty days from the date of notification, pursuant to Article 19 of Law No. 12,995 of 2014.

49. In accordance with paragraph 3 of article 45 of the Brazilian Regulation, a period of twenty days, counted from the date of publication of the start of the review, was granted for the submission of applications for qualification by other parties that considered themselves interested.

50. Please note that commencement notices were sent to the national producers not represented in the petition, containing the email address where specific questionnaires for these companies could be obtained.

2.5. Upon receipt of the requested information

2.5.1. From the petitioner and other national producers

51. The petitioner presented her information in the initial petition for this review and when presenting their supplementary information.



52. There was no response to the national producer questionnaire from the other producers.  
acquaintances.

2.5.2. Of the importers

53. The identified importers did not respond to the questionnaire.

2.5.3. From producers/exporters

54. No responses were submitted to the questionnaire from producers/exporters.

2.6. On-site verifications

2.6.1. On-site verification in the domestic industry

55. It should be emphasized that this end-of-period review of the antidumping measure will involve an analysis of the probability of a recurrence of injury to the domestic industry, as detailed in item 8 of this document.

56. In this sense, given the peculiarity of the case in question and considering the constitutional principle of efficiency, under Article 37 of the Federal Constitution of 1988, and the principles of reasonableness, proportionality, and purpose, under Article 2 of Law No. 9,784 of 1999, which governs the administrative process within the scope of the Federal Public Administration, it is hereby informed that no **on-site** verification of the domestic industry will be carried out for the aforementioned review, as there is no need for analysis.

of damage caused.

2.6.2. **On-site** verifications at producers/exporters

57. There was no on-site verification at the producers/exporters due to the absence of  
answer the questionnaire.

2.7. Regarding the extension of the investigation

58. Considering the current workload of the investigating authority, it was recommended that the deadline for completing the aforementioned investigation be extended to up to 11 months, as provided for in Article 105 of Decree No. 8,058 of 2013.

59. In this regard, through SECEX Circular No. 35/2025, the deadline was extended for twelve months,  
The deadline for completing this review is counted from the date it begins.

2.8. Review deadlines

60. The deadlines published in SECEX Circular No. 35, of May 22, 2025, published in the Official Gazette of May 23, 2025, which refer to Articles 59 to 63 of Decree No. 8,058 of 2013, as established by paragraph 5 of Article 65 of the Brazilian Antidumping Regulation, are presented in the table below:

Legal provision: Decree No. 8,058 of 2013	Deadlines	Expected dates
art.59	Closure of the evidentiary phase of the investigation.	10/07/2025
art. 60	Closure of the phase for comments on the data and information contained in the case file.	30/07/2025
art. 61	Publication of the technical note containing the essential facts under analysis that will be considered in the final decision.	28/08/2025
art. 62	Deadline for submission of final statements by interested parties and conclusion of the investigation phase of the process.	17/09/2025
art. 63	Expedition, by DECOM, of the final determination opinion.	06/10/2025

Source: Decree No. 8,058, of July 26, 2013.

Prepared by: DECOM.

2.9. Regarding the conclusion of the investigation phase of the process.

2.9.1. Closing of the evidentiary phase



61. In accordance with the provisions of article 59, paragraph 1, of Decree No. 8,058 of 2013, the phase  
The evidentiary phase of the investigation was concluded on July 10, 2025.

62. On July 30, 2025, the period for submitting comments on the data also ended.  
and the information contained in the records, pursuant to Article 60 of Decree No. 8,058 of 2013.

2.9.2. Disclosure of essential facts under judgment

63. Based on the provisions of article 61, paragraph 1, of Decree No. 8,058 of 2013, Technical Note DECOM SEI No. 1828/2025/  
MDIC, containing the essential facts under consideration that would support this final determination, was made available to the interested parties  
on September 1, 2025, in accordance with article 63 of the same Decree.

2.9.3. Of the final statements

64. Since the aforementioned Technical Note was published on September 1, 2025, the deadline for comments referred to in  
Article 62 was extended to September 22, 2025, when the deadline for comments and procedural instruction ended. During the aforementioned  
period, the petitioner submitted written comments regarding the aforementioned technical note and the factual and legal elements contained  
therein. The points addressed by this interested party have been incorporated into the related items of this document.

3. PRODUCT AND SIMILARITY

3.1. Regarding the product subject to the antidumping duty

65. As set forth in SECINT Ordinance No. 505, of July 23, 2019, published in the Official Gazette on July 25, 2019, the  
product subject to the antidumping duty is new rubber tires for passenger cars, of radial construction, of the 65 and 70 series, 13" and  
14" rims, and 165, 175 and 185 treads, hereinafter referred to as "automobile tires", originating from South Korea, Thailand and  
Chinese Taipei.

66. It should be noted that the tires covered by the specifications in the previous paragraph,  
including **extra** load ("XL") shipments, are within the scope of the antidumping duty in question.

67. Construction tires are excluded from the scope of the applicable antidumping duty.  
diagonal and tires with rims, series and treads different from those specified.

68. Regarding the production process and distribution channels, the product subject to the antidumping duty has raw  
materials and a production process similar to the process described in item 3.3 of this document, and has the same distribution  
channels.

69. The bands (165, 175 and 185) indicate the nominal width of the tire expressed in millimeters. The series 65 and 70  
indicate the approximate percentage ratio between the section height and the nominal width of the tire. The letter R indicates that the  
tire construction type is radial, and rims 13 and 14 indicate the inner diameter of the tire expressed in inches.

70. It should be noted that, in researching the procedures adopted in previous investigations, it was identified that new radial  
rubber tires for passenger cars, series 65 and 70, rims 13" and 14", and treads 165, 175 and 185, mounted on wheels, accompanied by  
wheels, parts or accessories, are included in the scope of this review, having been duly considered in the determination of the prices presented.  
Similarly, tires sold in kit form are also included in the scope of the product subject to this review.

3.2. Classification and tariff treatment

71. Automobile tires are commonly classified under tariff subheading 4011.10.00 of the Mercosur Common Nomenclature  
(NCM/SH), which covers products other than the product subject to the antidumping duty, such as tires with diagonal construction or  
rims, series and treads different from those specified.

72. The description of the aforementioned tariff sub-item belonging to is presented below.  
Common Nomenclature of Mercosur (NCM/SH):

Tariff Classification

4011	New rubber tires
------	------------------



4011.10.00	Of the type used in passenger cars (including mixed-use vehicles ( <b>station wagons</b> )). <b>wagons</b> ) and racing cars)
------------	--

Source and elaboration: DECOM.

73. The import tax rate remained unchanged at 16% for the NCM sub-item.  
mentioned above until October 15, 2024, when its rate was increased to 25%, in  
terms of Gecex Resolution No. 648, of October 14, 2024.

74. It should be noted that the aforementioned sub-item is subject to the following tariff preferences,  
Grants from Brazil/Mercosur that reduce the import tax rate levied on...

Similar product/object of investigation:

Tariff Preferences

Country/ Legal	Basis	Preferred Tariff
Argentina ACE18	Mercosur	100%
Uruguay	ACE18 - Mercosur	100%
Paraguay	ACE18 - Mercosur	100%
Chile	ACE35-Mercosur-Chile	100%
Bolivia	ACE36-Mercosur-Bolivia	100%
Mexico	ACE55-Mexico-Brazil	100%
Peru	ACE58-Mercosur-Peru	100%
Colombia ACE59	Mercosur-Colombia 100%	
Ecuador	ACE59-Mercosur-Ecuador 55%	
Venezuela ACE56	9-Mercosur-Venezuela 100%	
Cuba	APTR04-Brazil-Cuba	28%
Panama	APTR04-Brazil-Panama	28%
Israel	ALC-Mercosur-Israel	90%
Egypt	ALC-Mercosur-Egypt	100%



Source: SISCOMEX/MDIC.

Prepared by: DECOM.

3.3. Of the product manufactured in Brazil

75. The product manufactured in Brazil is the new rubber tire for passenger cars.  
radial construction, 65 and 70 series, 13" and 14" rims, 165, 175 and 185 widths, with the following  
designations: 165/65 R 13, 165/65 R 14, 175/65 R 13, 175/65 R 14, 185/65 R 13, 185/65 R 14, 165/70 R 13,  
165/70 R 14, 175/70 R 13, 175/70 R 14, 185/70 R 13 and 185/70 R 14.

76. According to Anip, the main raw materials for tire production are...  
Natural rubber, synthetic rubber, carbon black, sulfur, antioxidants, mineral oils, pigments  
Various materials, accelerators and retarders, zinc oxide, carcass cords and steel wires.

77. The petitioner reported that the tires produced by the domestic industry are made up of  
of beads, tarpaulins, stabilizer belts, tread, sidewall, shoulder, shock absorbers, liner, spokes,  
grooves, anti-friction, bead cover, sub-tread and compounds, detailing the following parts:

- a) Tread: part of the tire made of elastomers that has the function of coming into contact with  
contact with the ground;
- b) Tarpaulins: layers of metallic or textile cables, impregnated with elastomers, which  
They form the resistant structure of the tire;
- c) Carcass ply: the inner part of the tire's resistant structure, from which cords extend.  
one slip to the other;
- d) Protective Tarp: also called "Protective Strap", it is the outer part of the structure.  
The tire's resistant component, which is designed to protect the working plies;
- e) Work Tarp: also known as "Work Strap" or "Stabilizing Tarp", is the  
part of the radial tire's resistant structure that serves to stabilize the tire;

f) Sidewall: also called "Side or Lateral", is the lateral part of the tire, comprising between the tread and the bead;

g) Beads: parts located below the sidewalls, consisting of metal rings covered with elastomers and wrapped in plies, with a shape and structure such that they allow the tire to sit properly.  
rim;

h) Carcass: the tire's resistant structure, consisting of one or more overlapping layers of plies. It is the part of the tire that supports the load once it is inflated;

i) Cord or Rope: the result of twisting one or more metallic or textile threads that make up the canvas; and

j) Shoulders: outer parts of the tread where they intersect with the sidewalls.

78. Furthermore, regarding support, tires can be classified as:

a) Tubeless tire: a tire designed for use without an inner tube; and

b) Tire with inner tube: tire designed for use with an inner tube.

79. Regarding the usage category that indicates the type of application for which the tire is intended, tires can be classified as:

a) Standard tire: tire designed for predominant use on paved roads;

b) Reinforced tire: one whose casing is more resistant than that of an equivalent normal tire, and can withstand more load;

c) Mixed-use tire: tire suitable for use in vehicles that travel alternately by paved or unpaved roads; and

d) Off-road tire: tire with a special tread pattern for off-road use.  
public highways.

80. Regarding the structure (or construction), which indicates the form of construction and the arrangement of the Based on the tire's robust structural plies, tires can be classified as:



a) Diagonal tire: one whose structure features the plies extending to the beads and oriented in such a way as to form alternating angles, significantly less than 90° in relation to the median line of the tread. However, Brazilian production of diagonal-type automobile tires is decreasing (according to the petitioner, this only occurs in "older designs") and is being replaced by the production of radial-type tires due to performance and user safety issues; and

b) Radial tire: one whose structure consists of one or more plies whose cords are arranged bead to bead and placed approximately 90° in relation to the median line of the tread, this structure being circumferentially stabilized by two or more essentially inextensible plies. According to the petitioner, the radial tire is characterized by the application of differentiated raw materials and presents a more complex production process, conferring better quality and performance.

81. Regarding the tread pattern, tires can be classified as:

a) Symmetrical Tread Pattern: a pattern that, in relation to the longitudinal axis, presents a sculptural similarity;

b) Asymmetrical Tread Pattern: a pattern that does not present, in relation to the axis longitudinal, similarity of sculpture, linked to a specific carcass structure or not; and

c) Tread Pattern with Direction of Rotation: a pattern designed for a single direction of rotation, linked to a specific carcass structure or not.

82. Tires may be presented mounted on wheels or not, accompanied by wheels, parts or accessories, or without wheels, parts or accessories. Similarly, tires may be presented in the form of kits.

83. The main functions performed by tires are to statically and dynamically support the load, ensure the transmission of engine power, ensure drivability, ensure vehicle braking, and guarantee stability and grip.



84. Tires manufactured by the domestic industry are intended for passenger cars and are sold to both the primary market (car manufacturers) and the secondary or replacement market.

85. The main raw materials for tires produced by the domestic industry are natural rubber, synthetic rubber, carbon black, sulfur, antioxidants, mineral oils, various pigments, accelerators and retarders, zinc oxide, carcass cords, and steel wires.

86. The domestic industry produces radial passenger tires for tubeless use only . The product line consists of tires for city **(on-road)** and mixed **(on/off-road) use**.

Regarding tread pattern, the models are symmetrical, asymmetrical, and with a direction of rotation.

87. The production process of tires manufactured in Brazil can be divided into three phases. The first phase of tire manufacturing is the preparation of the compound. It is made up of various types of natural and synthetic rubber, carbon black, accelerators, and chemical pigments, which are placed in a mixer **(Banbury mixer)** where the elements are homogenized (mixed). Each part of the tire has a specific compound, that is, with different physical and chemical properties.

88. After the compound is ready, the next step is to produce the components. These components are: tread, sidewall, bead, body plies, stabilizer plies, and watertight seal.

89. The tread (the part of the tire that comes into contact with the ground) and the sidewall are produced by the extrusion process. A machine called an extruder, a kind of screw, rotates, heats, and pushes the compound into a mold, where the components take on their final shapes.

90. The body plies and the sealing sheet are formed in the calender. This calender has three or more cylindrical rollers that produce the rubber sheets. These sheets are joined to polyester and nylon fabrics (also used as reinforcement), forming the body plies.

91. In the formation of stabilizing plies (made by the extrusion process), several steel wires receive a layer of rubber and form a strip of a determined width. These strips are then cut at angles, completing the production of the component. It is important to differentiate one ply from another: body plies are those formed by polyester and nylon; stabilizing plies are formed by steel wires; and the waterproof ply, in turn, is formed only by rubber (compound).

92. The bead (the part of the tire that connects to the wheel) passes through a small extruder, which applies a layer of rubber onto steel wires. These wires are wound onto cylinders that form the component.

93. The second phase comprises the construction process, in which the carcass (the tire's skeleton that supports the load) is produced. Some of the components (sealed, body ply, and bead) are applied in a machine, similar to a drum, forming the carcass. Then, the stabilizing ply and the tread are applied.

94. The third phase consists of vulcanization, a process that gives shape to the tire. For this, the tire is placed in a press under a specific temperature, pressure, and time. This press has a mold with the specific characteristics of each product, in which the final shape and pattern of the tread are determined.

95. After vulcanization, the tire undergoes final inspection, where all inspections and release tests are carried out, thus ensuring consistency and reliability in its performance.

96. The production process is common to all types of tires similar to the tire that is the subject of the right, encompassing all stages of this process, that is, from the receipt of raw materials, preparation of compounds, preparation of components and, finally, the construction of the tire which, after the final stage of production, is destined for the finished goods warehouse.

3.4. On similarity



97. According to Article 9 of Decree No. 8,058 of 2013, the term "similar product" shall be understood as a product identical, equal in all respects to the product under investigation or, in its absence, another product that, although not exactly equal in all respects, presents characteristics very close to those of the product under investigation. Paragraph 1 of Article 9 of Decree No. 8,058 of 2013 establishes a list of objective criteria based on which similarity should be evaluated. Paragraph 2 of the same article establishes that such criteria do not constitute an exhaustive list and that none of them, individually or collectively, will necessarily be able to provide a decisive indication.

98. Thus, the petitioner pointed out that there are no differences in the uses and applications of the product subject to this review and the similar national product, since the products have significantly similar physical characteristics, following the same international quality standards and technical norms in Brazil, as indicated in item 3.2 of this document.

99. The information presented in the petition and in the supplementary information corroborates the conclusions about similarity reached in the original investigation and in previous reviews.

100. For the purposes of this document, it was concluded that the product manufactured in Brazil is similar to... product that is the subject of the investigation.

#### 4. FROM THE DOMESTIC INDUSTRY

101. Article 34 of Decree No. 8,058 of 2013 defines domestic industry as the entirety of Producers of the domestic like product. In cases where it is not possible to gather all of these producers, the term "domestic industry" will be defined as the group of producers whose combined production constitutes a significant proportion of the total national production of the domestic like product.

102. Although Anip highlighted that it represents all national producers of the product under review, data necessary for determining the recovery analysis of damage from three national producers were presented: Bridgestone do Brasil Ind. e Comércio Ltda., Continental do Brasil Produtos Automotivos Ltda., and Pirelli Pneus Ltda.

103. The petitioner also submitted letters of support from two other national producers - Goodyear do Brasil Produtos de Borracha Ltda. and Sumitomo Rubber do Brasil Ltda., which presented data on production volume and sales during the period of damage analysis.

104. In this sense, the domestic industry was defined, for the purposes of initiating the review, as the automobile tire production lines of the companies Bridgestone, Continental, and Pirelli, which represented approximately 41% of Brazilian production in P5, as reported by Anip, the representative of the sector's producers.

#### 5. CONTINUATION OR RESUMPTION OF DUMPING

##### 5.1. Continuation/resumption of dumping for the purpose of initiating a review.

105. According to Article 7 of Decree No. 8,058 of 2013, dumping is considered to be the introduction of a good into the Brazilian market, including under the **drawback modality**, at an export price lower than its normal value.

106. According to Article 107 in conjunction with Article 103 of Decree No. 8,058 of 2013, the determination that the termination of the duty would very likely lead to the continuation or resumption of dumping must be based on an objective examination of all relevant factors, including the existence of dumping during the period of validity of the measure (item 5.1); the performance of the producer or exporter (item 5.2); changes in market conditions, both in the exporting country and in other countries (item 5.3); and the application of trade defense measures on the similar product by other countries and the consequent possibility of trade diversion to Brazil (item 5.4).

107. For the purposes of initiating the review, the period from July 2019 to June 2024 was used in order to verify the existence of evidence of the likelihood of continuation or resumption of dumping practices in exports to Brazil of automobile tires originating from Thailand and Chinese Taipei.

108. It should be noted that, as will be seen in item 6 below, the imports of automobile tires originating from the investigated sources were carried out in non-representative quantities, and the probability of a resumption of dumping practices was analyzed.

##### 5.1.1. From Thailand



5.1.1.1. Of the normal value

109. For the purposes of initiating the review, the constructed normal value for Thailand was determined, since More precise information regarding prices in that country is not currently available. The constructed normal value was determined specifically for the similar product, which makes the information more... reliable, in relation to other methodologies, such as exports to third countries, which, more than Sometimes, they are based on broader tariff classifications than the similar product.

110. The normal value assigned to Thailand, for the purposes of initiating the review, was constructed from public information and, when sufficient public information is not available, based on values obtained from the cost of the petitioning companies, determining, for this purpose, the specific consumption of the main Items related to the cost of manufacturing automobile tires. All of these consumptions were calculated. per ton of finished product, so the calculation of the normal value was carried out in this unit.

111. Thus, the normal value was constructed from a reasonable value of the production costs, plus amounts for general, administrative, financial and sales expenses, as well as an amount as profit, from the following categories:

- a) raw materials and supplies;
- b) utilities
- c) labor
- d) other variable costs;
- e) other fixed costs;
- f) general, administrative, and commercial expenses; and
- g) profit.

112. The construction of the normal value was based on the technical production coefficients of the tires. the best-selling product among the three national producers that make up the domestic industry, having been used the Simple average of the individual coefficients for each company/product. The values of the various items of Costs have been adjusted to reflect costs relevant to Thailand, aiming for greater accuracy and adherence to... Market reality. Below are the technical coefficients applied to the main raw materials used:

Material (kg)	Bridgestone		Continental				Pirelli Tires				
	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]		Coefi Tech (kg/k tire)
Rubber Synthetic	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CON	
Rubber Natural	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CON	
Black smoke	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CON	
Wires	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CON	
Fabrics	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CON	
Chemists, Others	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CON	
TOTAL MATERIAL	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00

Source: Petition.

Prepared by: DECOM.

113. Regarding the values of these items, the main sub-positions of the Harmonized System for materials used in production, with the exception of the "Chemicals and" group. "Others". For each of these sub-positions, the average import price from Thailand was calculated, using statistical data from TradeMap relating to period P5.

114. The applicable import tax was added to the average import price. obtained through consultation of the **Market Access Map website**, and values relating to hospitalization and freight expenses. Domestic figures, calculated based on information available on the World Bank's **Doing Business website** . In this way, the final prices of raw materials in Thailand were established, to be considered. in the construction of the normal value:

Material Prices in Thailand		
Material	Sub-item Average	Domestic Price CIF US\$ /kg
Synthetic Rubber 4002.19		1.84
Natural Rubber 4001.22		1.84
Carbon Black 2803.00	1.32	
Wires	7217.30	1.14
Fabrics	5902.10	4.25

Source: Trademap, WTO and Doing Business

Prepared by: DECOM.

115. Next, the average prices of the materials were obtained on an ex-factory basis, that is, including all expenses necessary to have the material available at the factory gate for consumption. These prices were then multiplied by the technical coefficients of each material, reflecting The specific quantity used in tire production.

116. In the case of raw materials categorized as "Chemicals and Others", the cost was calculated based on the share of this item in the total cost of raw materials for the three producers. nationals that make up the domestic industry. This share represented [CONFIDENTIAL]% of that cost.

117. This methodology allowed for the estimation of the costs of each material in the process of construction of the normal value:

Cost of Materials			
Materials	Raw Material Price (US\$/kg)	Technical Coefficient (kg/kg tires)	US\$/kg of tire
Synthetic Rubber 1.89		[CONF.]	[CONF.]
Natural Rubber 1.67		[CONF.]	[CONF.]
Carbon Black 1.33		[CONF.]	[CONF.]
Metal Reinforcement 1.19		[CONF.]	[CONF.]
Fabrics	4.53	[CONF.]	[CONF.]
Chemicals and Others			[CONF.]
TOTAL			[CONF.]
<b>Source:Trademap, WTO eDoing Business.</b> Prepared by: DECOM.			

118. For the determination of the cost of utilities in the calculation of the normal value, the Petitioner It also used technical coefficients from each of the national ID producers, determining... The average. These technical coefficients were:

- a) Electrical energy: [CONFIDENTIAL] kWh per kg of tire; and
- b) Natural gas: [CONFIDENTIAL] m³ per kg of tire

119. For electricity prices in Thailand, the Global **Petrol** platform was consulted. **Prices**, with data referring to March 2024, indicate US\$0.124/kWh.

120. In the case of natural gas, the average import price from Thailand was used for the subheading 2711.11 of the Harmonized System, with **TradeMap** data for the period from July 2023 to June 2024, plus hospitalization and domestic freight expenses, obtained from information from The World Bank's **Doing Business website** notes that there was no increase in import tax. because Thailand applies a 0% rate to tariff codes under subheading 2711.11, according to data from WTO.



121. To convert the price of natural gas from US\$/kg to US\$/m<sup>3</sup>, a factor of was used.  
Conversion of 1 m = 0.829 kg, based on data presented by the statistical institute of the Countries  
Low. Costs for other utilities were also determined, based on the average proportion of such.  
costs of ID companies, with such participation representing [CONFIDENTIAL]% of costs with  
utilities. Using this methodology, the prices of utilities in Thailand were determined, to be  
applied in the construction of the normal value:

Cost of Utilities			
Materials	Price Utility	Technical Coefficient (kg/kg tires)	Cost in US\$/kg of tire
Electrical energy	US\$0.12 /kWh	[CONF.]	[CONF.]
Natural gas	US\$0.52/m <sup>3</sup>	[CONF.]	[CONF.]
Other uses			[CONF.]
TOTAL			[CONF.]
Source: Trademap, WTO and Doing Business, Global Petroleum Prices, National Institute of Statistics From the Netherlands.			
Prepared by: DECOM			

122. For the cost of labor in Thailand, the average wage in the sector of was used.  
manufacturing, according to data **from the Bank of Thailand**, which indicated an average salary of THB\$ 22,187.05 in P5,  
or US\$620.22. Next, the average productivity of ID companies (employees) was used.  
direct/indirect costs in production per kg of tires produced), resulting in a coefficient of  
[CONFIDENTIAL] employed per kg of tire produced, making a cost of US\$  
[CONFIDENTIAL] per kg of tire produced.

123. For the remaining production cost items - other variable costs and other fixed costs  
(excluding direct labor and depreciation) - its share of the cost was taken as a basis.  
production of materials (synthetic rubber, natural rubber, carbon black, wires, fabrics and  
(chemicals) of the tires from the national manufacturers considered: [CONFIDENTIAL] % and [CONFIDENTIAL]%  
respectively, in P5. The manufacturing cost per kg of tire was thus obtained:

Other Costs	
	US\$/kg
Other variable costs	[CONF.]
Fixed Costs (excluding Labor and Depreciation)	[CONF.]
Source: petition	
Prepared by: DECOM	

124. After determining the cost of production, for the purpose of determining the normal value, the following were...  
added amounts relating to depreciation, operating expenses and profit margin, determined  
based on the financial statement of the Cheng Shin Rubber Ind. Co. Ltd. group, of which the  
MAXXIS International (Thailand) Co. Ltd., a manufacturer of automobile tires in Thailand,  
according to Tire Business 2023.

125. The values for expenses and operating profit were obtained by applying a percentage of  
participation of these items, calculated in relation to the cost of goods sold at Cheng Shin company.  
Rubber, regarding the value of the production cost resulting from the sum of the amounts referred to in the paragraphs.  
previous.

Summary of Results - Cheng Shin Rubber Company

	\$	%/Cost
1. Sales revenue	17,446,799	
2. Operating costs 3.	-12,259,953	
COGS (2. operating cost - 6. depreciation and amortization) -10,819,446		
4. Gross profit from operation 5.	5,138,501	47.5%
Operating expenses (5.1. + 5.2. + 5.3. + 5.4.)	-3,476,956	32.1%
5.1. Selling expenses	-1,428,992	



5.2. General and administrative expenses 5.3.	-975.723	
Research and development expenses	-722.274	
5.4. Finance costs	-349.967	
6. Depreciation and amortization 7.	1,440,507 13.3%	
Operating profit	2,020,789 18.7%	

126. Thus, the amounts detailed below were obtained for the highlighted items:

Items	US\$/kg
Operating Expenses + Depreciation 0.88	
Operating Profit Source:	0.36
petition.	
Prepared by: DECOM.	

127. Based on this data, the constructed normal value was determined, under the delivered condition.

Thailand:

Normal constructed value of automobile tires [CONFIDENTIAL] [RESTRICTED]	
	US\$/kg
1. Materials	[CONF.]
Synthetic rubber	[CONF.]
Natural rubber	[CONF.]
Carbon black	[CONF.]
Wires	[CONF.]
Fabrics	[CONF.]
Chemicals and Others	[CONF.]
2. Utilities	[CONF.]
Electrical Energy	[CONF.]
Natural gas	[CONF.]
Other uses	[CONF.]
3. MDO (CV and CF)	[CONF.]
Direct and indirect MDO	[CONF.]
4. Other Variable Costs	[CONF.]
5. Fixed Costs (excluding Labor and Depreciation) [CONF.]	
6. Manufacturing Cost 7.	[RESTRICTED]
Operating Expenses + Depreciation 8.	[RESTRICTED]
Operating Profit	[RESTRICTED]
9. Constructed Normal Value	[RESTRICTED]
Source: Petition	
Prepared by: DECOM.	

128. Thus, for the purposes of initiating the review, the normal value determined for Thailand was:

US\$ [RESTRICTED] /kg ([RESTRICTED] per kilogram), on the **delivered condition**.

129. In order to determine the likelihood of a resumption of dumping, efforts were made to internalize the The normal price in Thailand on the Brazilian market, to enable comparison with the average price of sale of the similar domestic product in the same market, given the volume of exports of Thailand's relationship with Brazil was considered insignificant during the analysis period for the continuation/resumption of... dumping.

130. To the normal value constructed in the **delivered condition**, values relating to were added. export expenses, obtained through the Doing **Business platform**; international freight and insurance, considering data from the Organisation for Economic Co-operation and Development (OECD), according to suggested by the petitioner, given that there were no exports in a representative volume during the period of analysis; the Import Tax, considering the application of the 25% rate on the CIF price; the



AFRMM is calculated by applying a percentage of 8% to the value of international freight, and expenses of hospitalization, calculated by applying the [RESTRICTED] percentage to the CIF value, same percentage considered in the last end-of-term review.

131. The conversion of the CIF price from US dollars to Brazilian reais was performed using the average exchange rate for the period of the continuation/resumption of dumping investigation, obtained with based on the official daily exchange rates published by the Central Bank of Brazil (average exchange rate) (BRL-USD of R\$5.00/US\$1.00). Thus, for the purposes of initiating the review, the normal value was obtained. Built under CIF terms, internalized in the Brazilian market, as shown in the table below:

Normal Value Internalized in the Brazilian Market - Thailand	
[RESTRICTED]	
	US\$/kg
(A) Delivered selling price of the product in the exporting country's market [RESTRICTED]	
(B) Domestic freight in the exporting country	[RESTRICTED]
(C) Export Expenses	[RESTRICTED]
(D) FOB Price (A+B+C)	[RESTRICTED]
(E) International Freight and Insurance	[RESTRICTED]
(F) CIF Price (D+E)	[RESTRICTED]
(G) Import Tax (25%)	[RESTRICTED]
(H) AFRMM (8% on maritime freight)	[RESTRICTED]
(I) Inpatient Expenses (J) Inpatient	[RESTRICTED]
CIF Price (F+G+H+I)	[RESTRICTED]
Average exchange rate in period P5. Domestic	[RESTRICTED]
CIF price (R\$/kg).	[RESTRICTED]
Source: Petition. Prepared by: DECOM.	

132. Thus, for the purposes of initiating this review, the normal value for Thailand was determined, internalized in the Brazilian market at R\$[RESTRICTED] /kg ([RESTRICTED] per kilogram).

5.1.1.2. Average selling price of a similar product in the Brazilian market

133. For the purposes of comparison with the internalized average normal value, as predicted by Paragraph I of Section 3 of Article 107 of Decree No. 8,058 of 2013 used the average selling price of tires of domestically produced automobiles in the Brazilian market for the period from April 2023 to March of 2024.

134. To ensure a fair comparison, the price of automobile tires was determined, obtained by The division between the net operating revenue of the domestic industry and the net quantity sold of The product under investigation is described as follows:

Selling price of a similar product in the Brazilian market.			
[RESTRICTED]			
	Net revenue (in R\$)	Volume (kg)	Average price ( R\$/kg)
Price ID [RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Source: Petition. Prepared by: DECOM.			

135. The sale price determined during the period of analysis for the resumption of dumping, under the ex conditions factory, corresponded to R\$ [RESTRICTED] .

5.1.1.3. Comparison between the normal value in Thailand and the average selling price of Similar domestic product on the Brazilian market

136. For the purposes of initiating the review, the domestic industry price was considered to be, on a basis of... The factory price would be comparable to the normal value under the CIF (Cost per Unit) condition. This is because both conditions include the expenses necessary to make the merchandise available at a point within Brazilian territory, for



Customer pickup, not including domestic shipping within Brazil. The table below shows the result of the comparison between these prices.

137. The calculation performed to assess whether there is a likelihood of resuming dumping is presented below.

Comparison between internalized normal value and domestic industry price [RESTRICTED] In R\$/kg			
CIF Normal Value admitted (a)	Domestic industry price (b)	Absolute Difference (US\$/t) (%) (c) = (a) - (b) (d) = (c) / (b)	Relative Difference
[RESTRICTED]	[RESTRICTED]	2.70	8.9
Source: Previous tables. Prepared by: DECOM.			

138. Thus, for the purposes of initiating this review, it was found that the difference between the normal internalized value of Thailand in the Brazilian market and the price of the domestic industry was R\$2.70/kg (two reais and seventy cents per kilogram), demonstrating, therefore, that if the antidumping duty is abolished, in order for Thai imports to be competitive with the similar national product, there will most likely be a resumption of the practice of dumping in exports of automobile tires from Thailand to Brazil.

5.1.2. From Chinese Taipei

5.1.2.1. Of the normal value

139. For the purposes of initiating the review, the normal value for Chinese Taipei was determined similarly to that already presented for Thailand in the previous item, since more precise information regarding the prices practiced for that origin is not yet available. In this context, the constructed normal value was specifically determined for the like product, which makes the information more reliable compared to other methodologies, such as exports to third countries, which are often based on broader tariff classifications than the like product.

140. The normal value assigned to Taipei, for the purposes of initiating the review, was constructed from publicly available information and, when sufficient public information was not available, from values obtained from the cost of the petitioning companies, determining, for this purpose, the specific consumption of the main items related to the cost of manufacturing automobile tires. All these consumptions were calculated per ton of final product, so that the calculation of the normal value was carried out in this unit.

141. Thus, the normal value was constructed from a reasonable value of production costs, plus an amount for general, administrative, financial and sales expenses, as well as an amount for profit, from the following items:

- a) raw materials and supplies;
- b) utilities
- c) labor
- d) other variable costs;
- e) other fixed costs;
- f) general, administrative, and commercial expenses; and
- g) profit.

142. The construction of the normal value was based on the technical production coefficients of the best-selling tires from the three national producers that make up the domestic industry, using the simple average of the individual coefficients of each company/product, as already explained:

Material (kg)	Bridgestone		Continental				Pirelli Tires				
	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	Coe Tech (kg/ tire)



Rubber Synthetic	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]			
Rubber Natural	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CON		
Black smoke	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CON		
Wires	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CON		
Fabrics	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CON		
Chemists, Others	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CON		
TOTAL MATERIAL	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00

Source: Petition.

Prepared by: DECOM.

143. Regarding the values of these items, the main sub-positions of the Harmonized System for materials used in production, with the exception of the "Chemicals and" group. "Others". For each of these sub-positions, the average import price from Thailand was calculated, using statistical data from TradeMap relating to period P5.

144. The applicable import tax was added to the average import price. obtained through consultation of the Market Access Map website, and values relating to hospitalization expenses and Domestic freight costs, calculated based on information available on the Bank's Doing Business website. Global. In this way, the final prices of raw materials were established in Chinese Taipei, to be considered in the construction of the normal value:

Material Prices in Chinese Taipei		
Material	Sub-item	Average Domestic Price CIF US\$/kg
Synthetic Rubber	4002.19	2.39
Natural Rubber	4001.22	1.57
Carbon Black	2803.00	1.69
Wires	7217.30	1.80
Fabrics	5902.10	3.36



Source: Trademap, WTO and Doing Business	
Prepared by: DECOM.	

145. Next, the average prices of the materials were obtained in the ex **-factory condition**, that is, including all expenses necessary to have the material available at the factory gate for consumption. These prices were then multiplied by the technical coefficients of each material, reflecting The specific quantity used in tire production.

146. In the case of raw materials categorized as "Chemicals and Others", the cost was calculated based on the share of this item in the total cost of raw materials for the three producers. nationals that make up the domestic industry. This share represented [CONFIDENTIAL]% of that cost.

147. This methodology allowed for the estimation of the costs of each material in the process of construction of the normal value:

Cost of Materials			
Materials	Raw Material Price (US\$/kg)	Technical Coefficient (kg/kg tires)	US\$/kg of tire
Synthetic Rubber	2.39	[CONF.]	[CONF.]
Natural Rubber	1.57	[CONF.]	[CONF.]
Carbon Black	1.69	[CONF.]	[CONF.]
Metal Reinforcement	1.80	[CONF.]	[CONF.]
Fabrics	3.36	[CONF.]	[CONF.]
Chemicals and Others			[CONF.]

TOTAL	[CONF.]
Source: Trademap, WTO and Doing Business Prepared by: DECOM	

148. To determine the cost of utilities in the calculation of the normal value, the Petitioner also used technical coefficients from each of the national producers of ID, ascertaining...  
The average. These technical coefficients were:

- a) Electrical energy: [CONFIDENTIAL] kWh per kg of tire; and
- b) Natural gas: [CONFIDENTIAL] m³ per kg of tire

149. For electricity prices in Chinese Taipei, the Global Petrol Prices platform was consulted, with data referring to December 2023. For natural gas, the same Global Petrol Prices source was used, which indicates US\$ 0.024/kWh. To convert the natural gas price from US\$/kWh  
For US\$/m³, a conversion factor of 1 m³ = 0.1023 kWh was used, based<sup>3</sup> on data presented in the 2010 National Energy Balance by the Energy Research Company, a Brazilian public company.  
The costs of other utilities were also determined, based on the average proportion of such costs for ID companies, with this share representing [CONFIDENTIAL]% of utility costs.  
Using this methodology, the prices of utilities in Chinese Taipei were determined, to be applied in the construction of the normal value:

Cost of Utilities			
Materials	Price Utility Technical	Coefficient (kg/kg tires)	Cost US\$/kg of tire
Electricity US\$0.16/kWh	[CONF.]		[CONF.]
Natural gas	US\$0.23/m³ [CONF.]		[CONF.]
Other uses			[CONF.]
TOTAL			[CONF.]
Source: Global petroleum prices, National Energy Balance 2010. Prepared by: DECOM			



150. For labor costs, the average employee wage was used, according to data from the National Bureau of Statistics in Chinese Taipei, which indicated an average wage of NT\$44,461.00/month in P5, or US\$1,397.36. Then, the average productivity of ID companies (direct/ indirect employees in production per kg of tires produced) was used, a coefficient of [CONFIDENTIAL] employees per kg of tire produced, resulting in a cost of US\$[CONFIDENTIAL] per kg of tire produced.

151. For the remaining production cost items – other variable costs and other fixed costs (excluding direct labor and depreciation) – their share in the production cost of the materials (synthetic rubber, natural rubber, carbon black, wires, fabrics, and chemicals) of the tire from the national producers considered was used as a basis: [CONFIDENTIAL]% and [CONFIDENTIAL]% respectively, in P5. The manufacturing cost/kg of tire was thus obtained:

Other Costs	
	US\$/kg
Other variable costs	[CONF.]
Fixed Costs (excluding Labor and Depreciation) [CONF.]	
Source: petition. Prepared by: DECOM.	

152. After determining the cost of production, amounts relating to depreciation, operating expenses and profit margin were added to determine the normal value, also calculated based on the financial statement of the Cheng Shin Rubber Ind. Co. Ltd. group. It should be noted that this group also has a car tire production plant in Chinese Taipei, according to Tire Business 2023.

153. The values for expenses and operating profit were obtained by applying a percentage of participation of these items, calculated in relation to the cost of goods sold at Cheng Shin Rubber, to the value of the production cost resulting from the sum of the amounts referred to in the paragraphs.

previous.

Summary of Results - Cheng Shin Rubber Company

	\$	%/Cost
1. Sales revenue	17,446,799	
2. Operating costs 3.	-12,259,953	
COGS (2. operating cost - 6. depreciation and amortization) -10,819,446		
4. Gross profit from operation 5.1.	5,138,501 47.5%	
Selling expenses 5.2.	-1,428,992	
General and administrative expenses 5.3. Research	-975.723	
and development expenses	-722.274	
5.4. Finance costs	-349.967	
5. Operating expenses (5.1. + 5.2. + 5.3. + 5.4.)	-3,476,956 32.1%	
6. Depreciation and amortization 7.	1,440,507 13.3%	
Operating profit	2,020,789 18.7%	

154. Thus, the amounts detailed below were obtained for the highlighted items:

Items	US\$/kg
Operating Expenses + Depreciation 1.10	
Operating Profit Source:	0.46
petition. Prepared by: DECOM.	

155. Based on these data, the constructed normal value was determined, under the **delivered condition**.

Chinese Taipei:

Normal constructed value of <b>automobile</b> tires [CONF.][RESTRICTED]	
	US\$/kg
<b>1. Materials</b>	[CONF.]
Synthetic rubber	[CONF.]
Natural rubber	[CONF.]
Carbon black	[CONF.]
Wires	[CONF.]
Fabrics	[CONF.]
Chemicals and Others	[CONF.]
<b>2. Utilities</b>	[CONF.]
Electrical Energy	[CONF.]
Natural gas	[CONF.]
Other uses	[CONF.]
<b>3. MDO (CV and CF)</b>	[CONF.]
Direct and indirect MDO	[CONF.]
<b>4. Other Variable Costs</b>	[CONF.]
5. Fixed Costs (excluding Labor and Depreciation) [CONF.]	
6. Manufacturing Cost 7.	[RESTRICTED]
<b>Operating Expenses + Depreciation 8.</b>	[RESTRICTED]
<b>Operating Profit</b>	[RESTRICTED]
<b>9. Constructed Normal Value</b>	[RESTRICTED]
Source: Petition Prepared by: DECOM.	



156. Thus, for the purposes of initiating the review, the normal value determined for Chinese Taipei

This corresponded to US\$ [RESTRICTED] /kg ([RESTRICTED] per kilogram), under the **delivered condition**.

157. In order to determine the likelihood of a resumption of dumping, efforts were made to internalize the The normal price of Chinese Taipei on the Brazilian market, to enable comparison with the average price of... sale of the similar domestic product in the same market, given the volume of exports of The origin for Brazil was zero during the analysis period of the continuation/resumption of dumping.

158. To the normal value constructed in the **delivered condition**, values relating to were added. export expenses, obtained through the Doing **Business platform**; international freight and insurance, considering data from the Organisation for Economic Co-operation and Development (OECD), according to suggested by the petitioner, given that there were no exports in a representative volume during the period of analysis; the Import Tax, considering the application of the 25% rate on the CIF price; the AFRMM is calculated by applying a percentage of 8% to the value of international freight, and expenses of hospitalization, calculated by applying the [RESTRICTED] percentage to the CIF value, same percentage considered in the last end-of-term review.

159. The conversion of the CIF price from US dollars to Brazilian reais was performed using the average exchange rate for the period of the continuation/resumption of dumping investigation, obtained with based on the official daily exchange rates published by the Central Bank of Brazil (average exchange rate) (BRL-US\$ at R\$5.00/US\$1.00). Thus, for the purposes of initiating the review, the normal value was obtained. Built under CIF terms, internalized in the Brazilian market, as shown in the table below:

Normal Value Internalized in the Brazilian Market - Chinese Taipei [RESTRICTED]	
	US\$/kg
(A) Delivered selling price of the product in the exporting country's market [RESTRICTED]	
(B) Domestic freight in the exporting country	[RESTRICTED]
(C) Export Expenses	[RESTRICTED]
(D) FOB Price (A+B+C)	[RESTRICTED]
(E) International Freight and Insurance	[RESTRICTED]
(F) CIF Price (D+E)	[RESTRICTED]
(G) Import Tax (25%)	[RESTRICTED]
(H) AFRMM (8% on maritime freight)	[RESTRICTED]
(I) Inpatient Expenses (J) Inpatient	[RESTRICTED]
CIF Price (F+G+H+I)	[RESTRICTED]
Average exchange rate in period P5. Domestic	[RESTRICTED]
CIF price (R\$/kg).	[RESTRICTED]
Source: Petition. Prepared by: DECOM.	

160. Thus, for the purposes of initiating this review, the normal value for Thailand was determined, internalized in the Brazilian market at R\$[RESTRICTED] /kg ([RESTRICTED] per kilogram).

5.1.2.2. Average selling price of a similar product in the Brazilian market

161. For the purposes of comparison with the internalized average normal value, as predicted by Paragraph I of Section 3 of Article 107 of Decree No. 8,058 of 2013 used the average selling price of tires of domestically produced automobiles in the Brazilian market for the period from April 2023 to March of 2024.

162. To ensure a fair comparison, the price of automobile tires was determined, obtained by The division between the net operating revenue of the domestic industry and the net quantity sold of The product under investigation is described as follows:

Selling price of a similar product in the Brazilian market. [RESTRICTED]			
	Net revenue (in R\$)	Volume (kg)	Average price (R\$/kg)
Price ID [RESTRICTED]		[RESTRICTED]	[RESTRICTED]
Source: Petition. Prepared by: DECOM.			



163. The sale price determined during the period of analysis of the resumption of dumping, under **ex-works conditions**, corresponded to R\$ [RESTRICTED].

**5.1.2.3. Comparison between the normal internal value of Chinese Taipei and the average selling price of the similar domestic product in the Brazilian market.**

164. For the purposes of initiating the review, it was considered that the domestic industry price, on an ex- **works basis**, would be comparable to the normal value under the CIF (Cost, Insurance, and Freight) condition. This is because both conditions include the expenses necessary to make the goods available at a point in Brazilian territory for collection by the customer, without accounting for domestic freight within Brazil. The table below presents the result of the comparison between the aforementioned prices.

165. The calculation performed to assess whether there is a likelihood of resuming dumping is presented below.

Comparison between internalized normal value and domestic industry price [RESTRICTED] In R\$/kg			
CIF Normal Value admitted (a)	Domestic industry price (b)	Absolute Difference (US\$/t) (%) (c) = (a) - (b) (c) / (b)	Relative Difference (d) =
[RESTRICTED]	[RESTRICTED]	10.96	36.2%
Source: Previous tables.			
Prepared by: DECOM.			

166. Thus, for the purposes of initiating this review, it was found that the difference between the normal internalized value of Chinese Taipei in the Brazilian market and the price of the domestic industry was R\$10.96/kg (ten reais and ninety-six cents per kilogram), demonstrating, therefore, that if the antidumping duty is abolished, in order for imports originating from that country to be competitive in relation to the similar national product, there will most likely be a resumption of the practice of dumping in exports of automobile tires from Chinese Taipei to Brazil.

**5.2. Regarding the resumption of dumping for the purpose of final determination.**

**5.2.1. From Thailand**

**5.2.1.1. Of the normal value**

167. It should be noted that no producer/exporter questionnaires were submitted, nor was an alternative methodology presented for determining the normal value and analyzing the probability of resuming dumping.

168. Thus, based on the principle of economy, reference is made to item 5.1.1.1, which details the methodology for determining the constructed normal value for the purpose of initiating the review.

169. It should be noted, however, that, after review by the investigating authority of the aforementioned methodology for constructing the normal value, an inconsistency was identified in the amount of operating profit that makes up the **normal value delivered**. As already mentioned in item 5.1.1.1, the profit amount for Thailand was calculated based on the financial statements of the Cheng Shin Rubber Ind. Co. Ltd. group. Firstly, it was found that the operating profit amount in the group's statement does not consider financial expenses, and these expenses were used to calculate the operating expense used in constructing the normal value. It was also found that a percentage of profit on the cost of production less depreciation was calculated in the group's statement. However, in constructing the normal value, this percentage was applied to the total cost, including operating expenses.

170. Thus, an adjustment was made to the profit to be considered, deducting the expense.  
financial analysis of the profit amount determined, as demonstrated below.

**Corrected Profit Percentage - Cheng Shin Rubber Income Statement**

	\$	%/Cost
<b>Operating costs</b>	-12,259,953	
Depreciation and amortization CPV	1,440,507	
( operating <b>cost - depreciation and amortization</b> ) -10,819,446		



Operating profit	2,020,789 18.7%	
Finance costs	-349.967	
Adjusted operating profit	1,670,822 15.4%	

Source: Petition

Prepared by: DECOM

171. Furthermore, the calculated percentage was applied to the calculated production cost, and no longer to the total cost.

172. The construction of the normal value of Thailand under the condition delivered with the corrected value of Operating profit is shown in the following table.

Standard Built Value - Thailand

[RESTRICTED]

Manufacturing Cost	[RESTRICTED]
Operating Expenses + Depreciation	[RESTRICTED]
Operating profit	[RESTRICTED]
Normal Value Built	[RESTRICTED]
Source: Petition. Prepared by: DECOM.	

173. Regarding international freight and insurance, it was found, based on import data provided by the RFB, that [RESTRICTED] goods were imported from Thailand. Thus, although these imports were not considered representative in relative terms for the purpose of calculating the export price, DECOM understands that these import operations are suitable for calculating the freight and insurance value for Thailand in P5, considering the number of operations and the period in which they were carried out.

174. Furthermore, in order to verify the consistency of the value calculated based on such imports, the freight and insurance values in P5 were determined for the other origins that exported to Brazil in representative volumes during this period and that have a geographical location close to that of Thailand. The freight and insurance values for these origins and the value determined for Thailand are presented in the table below.

Comparison of Shipping and Insurance Costs

[RESTRICTED]

Origins, International freight and insurance (US\$/kg)	
Thailand	[RESTRICTED]
Vietnam	[RESTRICTED]
India	[RESTRICTED]
Malaysia	[RESTRICTED]
Indonesia	[RESTRICTED]
Sri Lanka	[RESTRICTED]
China	[RESTRICTED]

Source: RFB

PREPARED BY: DECOM

175. Comparing the international freight and insurance values for Thailand with the values for the other origins listed in the table, it is demonstrated that the cost of these items for Thailand is in line with that of the other origins, many of which have a significant volume, such as Vietnam, India, and Malaysia.

176. It is also noted that, given the marked discrepancy in relation to the values in the table, the freight and insurance estimate of US\$ 0.37/kg used to initiate the review, based on data from the Organisation for Economic Co-operation and Development - OECD, would apparently be incorrect.



overestimated. It should be noted that the case file does not contain details about the methodology applied by the OECD for calculating international freight and insurance. Nor was the authority able to obtain this information by searching the Organization's website.

177. Regarding the Import Tax, it should be noted initially that the 25% rate used for initial purposes is provisional, having been applied after P5. Furthermore, considering that the competitor's price is one of the determining factors in the price charged by a company, it can be inferred that, if a 25% Import Tax had been applied during the dumping analysis period, the average price of the domestic industry would have been higher during that period, especially since, due to competition from imported products from other origins, this price was depressed, such that the domestic industry presented a negative gross margin.

178. Thus, for the purposes of objective comparison with the average price of the domestic industry during the dumping analysis period, DECOM understands that the applicable rate of 16% at the time should be used in determining the normal value of the imported product, since, in addition to the temporary nature of the 25% rate, any increase in the Import Tax during the dumping analysis period would raise the price of the imported product and, consequently, the price of the domestic industry. It should also be borne in mind the prospective nature of the analyses undertaken during the end-of-period review.

179. Thus, for the purposes of final determination, following the same methodology adopted at the beginning of the review, and adjusting the items for profit, international freight and insurance, and Import Tax, the normal value constructed for Thailand on a CIF basis, internalized in the Brazilian market, was obtained, as presented in the table below.

Normal Value Internalized in the Brazilian Market - Thailand	
[RESTRICTED]	
	US\$/kg
(A) Delivered selling price of the product in the exporting country's market	[RESTRICTED]
(B) Export Expenses	[RESTRICTED]
(C) FOB Price (A+B)	[RESTRICTED]
(D) International Freight and Insurance	[RESTRICTED]
(E) CIF Price (C+D)	[RESTRICTED]
(F) Import Tax (16%)	[RESTRICTED]
(G) AFRMM (8% on maritime freight)	[RESTRICTED]
(H) Inpatient Expenses (I) Inpatient	[RESTRICTED]
CIF Price (E+F+G+H)	[RESTRICTED]
Average exchange rate in period P5. Domestic	[RESTRICTED]
CIF price (R\$/kg).	[RESTRICTED]
Source: Petition. Prepared by: DECOM.	

180. Thus, for the purposes of final determination, the normal value for Thailand was established, internalized in the Brazilian market at R\$[RESTRICTED] /kg ([RESTRICTED] per kilogram).

5.2.1.2. Average selling price of the similar product in the Brazilian market

181. It is noted that there has been no change in the selling price of the similar product in the Brazilian domestic market, as determined for the purposes of initiating the review. Therefore, reference is made to item 5.1.1.2 of this document.

182. The sale price determined during the dumping resumption analysis period, ex- **works**, corresponded to R\$ [RESTRICTED] / kg ([RESTRICTED] cents per kilogram).

5.2.1.3. Comparison between the normal value in Thailand and the average selling price of Similar domestic product on the Brazilian market

183. For the purposes of final determination, it was considered that the domestic industry price, on an ex- **works basis**, would be comparable to the normal value under the CIF (Cost, Insurance, and Freight) condition. This is because both conditions include the expenses necessary to make the goods available at a point in Brazilian territory for collection by the customer, without accounting for domestic freight within Brazil.

184. The following table presents a comparison between the normal value and the industry price.  
domestic.

Comparison between internalized normal value and domestic industry price [RESTRICTED] In R\$/kg			
Normal CIF value for hospitalized patients. (the)	Domestic industry price (b)	Absolute Difference (US\$/t) (c) = (a) - (b)	Relative Difference (%) (d) = (c) / (b)
[RESTRICTED]	[RESTRICTED]	-2.61	-8.6
Source: Previous tables.			
Prepared by: DECOM.			

185. Thus, for the purposes of final determination, it was found that the internalized normal value of  
The price in Thailand in the Brazilian market was 8.6% lower than the price in the domestic industry (R\$ 2.61/kg).

5.2.1.4. From the comparison between the normal value in Thailand and the average price of imports of  
other sources carried out in representative quantities

186. According to item II of § 3 of article 107 of Decree No. 8,058 of 2013, in the event of  
given that there were no exports in representative quantities during the review period, the probability  
The resumption of dumping can also be determined based on a comparison between the normal value and  
the average export price from other foreign suppliers to the Brazilian market in  
transactions made in representative quantities.

187. This analysis is justified by the fact that imports originating from Thailand must be  
competitive with imports from other sources so that they can be carried out in volume.  
sufficient to cause damage to the domestic industry. Thus, for this to occur, it is necessary that the  
The average price of imports from Thailand is not significantly higher than the average price of...  
Imports from representative origins.

188. Origins with a share greater than 3% were considered representative.  
total Brazilian imports. The table below shows the calculation of the average price.  
of the aforementioned origins, weighted by the imported volumes. It should be noted that Mexico and were excluded.  
Argentina, due to enjoying a 100% tariff preference, in addition to China, which has antidumping duties.  
applied, since such factors distort the average price under CIF conditions. However, even with the  
Excluding the cases, the imports considered represented [RESTRICTED]% of the total volume imported by  
Brazil is in P5, as shown in the table.

Representative Brazilian Imports in P5

[RESTRICTED]

P5	Imported volume (t)	Share of total imported	Average CIF price (US\$/kg)
Vietnam [RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
India	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Malaysia [RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Indonesia [RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Sri Lanka [RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Total	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]

Source: RFB.

Prepared by: DECOM.

189. The weighted average price for imports was thus determined under CIF sales conditions.  
from other sources in representative volumes of US\$ [RESTRICTED] /kg.

190. The following table presents a comparison between the normal value in Thailand and the price.  
average of such imports.

Comparison between normal value and average price of representative imports

[RESTRICTED] In US\$/kg





Normal Value CIF (a)	CIF price of representative imports (b)	Absolute Difference (US\$/t) (%) (c) = (a) - (b) (d) = (c) / (b)	Relative Difference
[RESTRICTED]	[RESTRICTED]	1.43	44.8

Source: Previous tables.

Prepared by: DECOM.

191. Considering that the average price of imports from other origins with representative volumes was significantly lower than the normal value found for Thailand, it can be concluded that this origin needs to practice dumping to export to Brazil in quantities sufficient to cause harm to the domestic industry.

5.2.2. From Chinese Taipei

5.2.2.1. Of the normal value

192. It should be noted that no producer/exporter questionnaires were submitted, nor was an alternative methodology presented for determining the normal value and analyzing the probability of resuming dumping.

193. Thus, based on the principle of economy, reference is made to item 5.1.2.1, which details the methodology for determining the constructed normal value for the purpose of initiating the review.

194. Additionally, the same adjustments made to the normal value for Thailand for final determination purposes also apply to the calculation of the normal value for Chinese Taipei, namely: adjustments to the amount and basis for calculating the profit margin, import tax, and international freight and insurance. In this regard, reference is made to item 5.2.1.1 concerning the details of the adjustments made.

195. In the case of profit, as already seen in the assessment of dumping for initial purposes, its calculation was also based on the income statement of the **Cheng Shin Rubber Ind. Co. Ltd. group**, using the same calculation methodology.



196. Thus, after adjusting the profit amount, the normal value was determined in **condition delivered for** final determination purposes, as demonstrated in the following table.

Normal Value Built - **Chinese Taipei**

[RESTRICTED]

Manufacturing Cost	[RESTRICTED]
Operating Expenses + Depreciation	[RESTRICTED]
Operating profit	[RESTRICTED]
Normal Value Built	[RESTRICTED]
Source: Petition. Prepared by: DECOM.	

197. Regarding international freight and insurance, it was found, based on a comparison with the values obtained for other origins from the official import data of the RFB (Brazilian Federal Revenue Service), presented in item 5.2.1.1, that the estimate of international freight and insurance of US\$ 0.45/kg used to initiate the review based on data from the Organisation for Economic Co-operation and Development (OECD) appears to be overestimated. Therefore, considering that Chinese Taipei did not export to Brazil during the dumping analysis period, the value obtained for China during that period will be used as the estimated freight and insurance value for that origin for the final determination, due to its geographical location.

198. After the aforementioned adjustments, the normal internal value for Chinese Taipei was determined. for the purposes of final determination, as demonstrated in the following table.

Normal Value Internalized in the Brazilian Market - Chinese Taipei [RESTRICTED]	
	US\$/kg

(A) Delivered selling price of the product in the exporting country's market <b>[RESTRIC</b>	
(B) Export Expenses	[RESTRIC
<b>(C) FOB Price (A+B)</b>	[RESTRIC
(D) International Freight and Insurance	[RESTRIC
<b>(E) CIF Price (C+D)</b>	[RESTRIC
(F) Import Tax (16%)	[RESTRIC
(G) AFRMM (8% on maritime freight)	[RESTRIC
(H) Inpatient Expenses <b>(I) Inpatient</b>	[RESTRIC
<b>CIF Price (E+F+G+H)</b>	[RESTRIC
Average exchange rate in period P5. <b>Domestic</b>	[RESTRIC
<b>CIF price (R\$/kg).</b>	[RESTRIC
Source: Petition. Prepared by: DECOM.	

199. Thus, for the purposes of final determination, the normal value for Chinese Taipei was ascertained, internalized in the Brazilian market at R\$[RESTRIC] /kg ([RESTRIC] per kilogram).

5.2.2.2. Average selling price of a similar product in the Brazilian market

200. It is noted that there has been no change in the selling price of the similar product on the market. Brazilian domestic industry data collected for the purpose of initiating a review. Therefore, reference is made to item 5.1.1.2 of this document.

201. The sale price determined during the period of analysis for the resumption of dumping, under the ex conditions **factory**, it corresponded to R\$ [RESTRIC] /kg ([RESTRIC] cents per kilogram).

5.2.2.3. Comparison between the normal value of Chinese Taipei and the average selling price of Similar domestic product on the Brazilian market

202. For the purposes of final determination, the price of the domestic industry was considered to be, in The baseex **factory price** would be comparable to the normal value under the CIF (Cost per Market) condition. This is because both... Conditions include the expenses necessary to make the goods available at a specific point in the territory. Brazilian price, for customer pickup, excluding domestic shipping within Brazil.

203. The following table presents a comparison between the normal value and the industry price. domestic.

Comparison between internalized normal value and domestic industry price [RESTRIC] In R\$/kg			
Normal CIF value for hospitalized patients (the)	Domestic industry price (b)	Absolute Difference (US\$/t) (c) = (a) - (b)	Relative Difference (%) (d) = (c) / (b)
[RESTRIC]	[RESTRIC]	3.99	13.2%
Source: Previous tables. Prepared by: DECOM.			

204. Thus, for the purposes of final determination, it was found that the difference in the comparison between the normal internalized value of Chinese Taipei in the Brazilian market and the price of the domestic industry. It was R\$ 3.99/kg (three reais and ninety-nine cents per kilogram), demonstrating, therefore, that if the The antidumping duty should be eliminated so that imports originating from that country are competitive in With regard to similar domestic products, there will most likely be a resumption of dumping practices in the market. Exports of automobile tires from Chinese Taipei to Brazil.

5.3. Producer/Exporter Performance

205. Thailand is one of the main tire production centers in Asia, benefiting from its position as the world's largest producer of natural rubber. In 2020, Thailand was the largest exporter of tires to the United States, demonstrating its ability to compete in markets. demanding and high-volume.

206. Thai exports of passenger car tires continue to grow, supported by a A robust infrastructure for supplying raw materials and a strong industrial base.



207. In the Thai automotive market, passenger cars hold a significant share. In 2023, Thai production of car tires was approximately 58 million units, with passenger car tires accounting for about 90% of total car tire production.

208. According to the petitioner, Thai tire production will continue to increase, with automobile tire production projected to reach 96.31 million units by 2033, achieving a compound annual growth rate (CAGR) of 5.2%.

209. All major global tire companies, such as Bridgestone, Michelin, Goodyear, Yokohama, Sumitomo, Pirelli, and Continental, have factories in Thailand. The country also has several domestic companies such as Deestone, Vee Rubber, Otani, SR Tyres, and Superstone, which serve both the domestic market and a considerably large export market.

210. According to **Trade Map data**, Thailand's total exports of radial tires for automobiles were 926,000 tons during the period analyzed for the resumption of dumping (July 2023 to June 2024), which is more than 7 times the Brazilian market (126,000 tons).

211. Meanwhile, Chinese Taipei has a solid and competitive tire industry, having shown steady growth in recent years and an expected growth of 5.97% from 2023 to 2028, especially in the passenger car tire segment.

212. Companies like Cheng Shin and Nankang Rubber are important players on the global stage and have demonstrated flexibility by relocating part of their production to other countries in order to circumvent the anti-dumping tariffs imposed by the United States. American tariffs on Chinese Taipei tires range from 20.04% to 101.84%, which has led some companies to seek alternatives to continue competing globally.

213. It is noticeable that a substantial portion of tire production in Chinese Taipei is destined for the export market. This export-oriented approach has helped consolidate the country's manufacturers in the global market.

214. According to **Trade Map data**, total exports of radial tires for automobiles from Chinese Taipei were 78,000 tons during the period of analysis of the resumption of dumping (July 2023 to June 2024), which corresponds to a volume equivalent to 62% of the Brazilian market.



**5.3.1. Regarding statements about producer/exporter performance**

215. On July 9, 2025, ANIP presented a statement highlighting that Thailand is one of the main tire production centers in Asia, and the 3rd largest exporter of passenger car tires in the world, according to Trademap data, and that, from 2023 to 2024, Thailand increased its exports of automobile tires by 12%, from a volume of 79,571,190 units to 88,776,479 units, emphasizing that this increase occurs as a result of its position as the world's largest producer of natural rubber.

216. It was also highlighted that, considering partial data from 2025, from January to May (the last month available **on TradeMap**), the country has already exported 38,014,674 units, showing a clear growth trend compared to the previous year, since, while in 2024 the monthly average of exports was 7,398,039 units/month, based on the partial data from 2025, the country reached the mark of 7,602,934.80 units/month exported, which represents an average growth of almost 3%.

217. Finally, it highlighted that these results reinforce the conclusions reached by the market study '**Thailand Automobile Tire Industry Research Report 2024-2033**' prepared **by Global Information, Inc.**, which predicted a compound annual growth rate (CAGR) of 5.2% for automobile tire production in Thailand until 2033, as presented by Anip in the opening petition for the review.

218. Regarding Chinese Taipei, Anip stated that this region has a solid and competitive tire industry, having shown constant growth in recent years and an expected increase of 5.97% from 2023 to 2028, especially in the passenger tire segment, according to data from a market report prepared **by TechSci Research LLC**. The report added that, based on this report, Chinese Taipei has an export-oriented commercial strategy, which has consolidated the country's manufacturers in the global market.

219. Anip highlighted that Cheng Shin, a company belonging to the Maxxis International group and a major player in the global market, has increased its production capacity of [CONFIDENTIAL], according to updated data from the Tire **Business Report**, the leading market report in the sector.

220. It was also highlighted that the **Tire Business 2024 Report** acknowledges that, among the 75 largest tire manufacturers, 4 are located in Chinese Taipei, and that the only countries with more manufacturers present in the ranking are China and India.

221. In view of the foregoing, Anip concluded that, given the high export potential of the investigated origins and, should the anti-dumping measures in force be terminated, there are indications that, very likely, the practice of dumping in exports from Thailand and Chinese Taipei to Brazil will resume, causing damage to the domestic industry.

222. On September 22, 2025, Anip presented its final statement, with more up-to-date data on Thailand's exports in 2025, indicating that, from January to July 2025, the country had already exported 54,184,596 units, representing a growth of 4.63% compared to the previous year.

223. It also recalled recent precedents in which export potential was fundamental in guiding DECOM's decision regarding the renewal of the antidumping duty.

**5.3.2. Regarding DECOM's positioning**

224. Regarding the conclusion on export potential, reference is made to item 5.7 of this document.

**5.4. Changes in market conditions**

225. Article 107 in conjunction with item III of Article 103 of Decree No. 8,058 of 2013 establishes that, for the purposes of determining whether the termination of the antidumping duty in force would very likely lead to the continuation or resumption of dumping against the domestic industry, it must be examined whether there have been any changes in market conditions in the exporting country, in Brazil or in third markets, including any changes in the supply and demand of the like product.

226. DECOM highlights that, as detailed in the following item, after the conclusion of the first end-of-period review, the US applied a trade defense measure to imports from South Korea, Thailand, and Chinese Taipei.



227. On July 9, 2025, Anip submitted a statement asserting that, since the opening of the investigation to the present date, there have been changes in international market conditions, including tariff and trade defense measures adopted by countries where major players in the automotive tire sector are located. It further alleged that these changes could lead to a redirection of the flow of passenger car tires from large consumer markets to Brazil.

228. Anip reinforced, in particular, the following measures:

Tariff measures adopted for the tire sector by the United States and Mexico: On April 2, 2025, a notice from the United States Federal Register published the list of HTS codes for auto parts that would be subject to an additional 25% tariff on imports from all countries, including automobile tires. Thus, in addition to the basic tariff applied to automobile tire imports, an additional 25% tariff has been in effect since May 3, 2025, significantly increasing the total tax burden on the imported product. Regarding Mexico, there was also an increase in the import tax rate for automobile tires **"De los tipos usados en automóviles de turismo (incluidos los del tipo familiar ("break" o "station wagon") y los de carreras")**, which went from 25% to 35%, through the 'Decree that amends the Tariff of the General Law on Import and Export Taxes', published on April 22, 2024, with a validity period of two years.

Trade defense measures applied by the United States: since July 19, 2021, a trade defense measure by the US has been in effect on imports of tires originating from South Korea, Thailand, and Chinese Taipei, with tariffs ranging from 14.62% to 101.84%.

**5.4.1. On statements regarding changes in market conditions**



229. On September 22, 2025, Anip presented its final statement, indicating additional market changes that could lead to a redirection of the commercial flow of passenger tires from major consumer markets to Brazil, highlighting the following measures:

The European Union launched an anti-dumping investigation in May 2025 against the import of car tires from China;

South Africa has launched an anti-circumvention investigation against Chinese manufacturers who were circumventing an existing anti-dumping measure by exporting car and truck tires through affiliates in Thailand, Vietnam, and Cambodia.

In Mexico, a draft decree is under review that aims to permanently raise the import tax rate on a range of products, including passenger car tires. If approved, the current 35% tariff would become permanent.

**5.5. On the application of trade defense measures**

230. Article 107 in conjunction with item IV of Article 103 of Decree No. 8,058 of 2013 establishes that, for the purposes of determining whether the termination of the antidumping duty in force would very likely lead to the continuation or resumption of dumping against the domestic industry, it must be examined whether trade defense measures have been applied to the similar product by other countries and the consequent possibility of trade diversion to Brazil.

231. Research on the website of the Integrated **Trade Intelligence Portal (I-TIP)** of the World Trade Organization (WTO) revealed that the US applied a trade defense measure to imports of tires originating from South Korea, Thailand, and Chinese Taipei on July 19, 2021.

232. There are also applications of trade defense measures by Brazil and the US against the China sells the same product.

**5.6. Regarding the statements about the resumption of dumping.**

233. On September 22, 2025, Anip submitted a final statement, informing that it had presented in the supplementary information data from Comexstat referring to the year 2024 for the purpose of calculating the international freight and insurance to be used in the normal value entry, given that the data previously presented, contained in the OECD Stat document International Transport and Insurance Costs of Merchandise Trade, were outdated, as they referred to the year 2020.

He highlighted that, based on Comexstat data – which indicates the values actually paid – it was demonstrated that international freight and insurance represented 12.7% of the FOB value of the merchandise for Thailand, and 7.7% for Chinese Taipei, and that, after updating the 2024 Comexstat data, these percentages were changed to 13.07% and 8.09%, respectively.

234. The petitioner argued that, for the calculation of the normal internalized value, the values of international freight and insurance determined based on Comexstat should be considered, since, as indicated by DECOM itself, the volume of imports determined based on RFB data is not very representative, making the calculation basis weak and questionable, especially considering that such exports were not considered sufficient for the purposes of analyzing the continuation of dumping.

235. It further argued that the comparison with freight rates from Vietnam, India, Malaysia, Indonesia, Sri Lanka, and China is not appropriate, given that these origins have distinct commercial profiles from those of the origins under analysis, and that the comparison with freight rates from other geographically close origins may be inaccurate, as it disregards the complexity of shipping routes and the specificities of each type of freight and exchange rate variations.

236. The petitioner pointed out that its calculation methodology is based on the total volume of passenger car tires imported from Thailand and Chinese Taipei in 2024, and that adopting a broader calculation base ensures greater accuracy and better reflects market reality, emphasizing that, although there are imports of other rim sizes, the difference between rim sizes has a marginal impact on the calculation of freight and insurance, as can be seen in other tire review processes.

237. It stated that the information presented by Anip is the best information available in the case file, since no interested party presented data or methodology for calculating freight and insurance expenses.



238. Finally, he highlighted that, in a recent precedent, the RFB data were considered.

Inadequate for calculating international freight and insurance values, as can be seen:

Resolution Gecex No. 725/2025: Extends antidumping duty applied to imports.

Brazilian table fans, originally from China.

**112. For the calculation of the normal value of goods imported into the Brazilian market, the unit international freight and insurance values obtained in the last review were added to the constructed normal value. It was decided to adjust the methodology considered at the beginning of the review, since the value determined from the RFB data proved to be quite low, which seems to stem from difficulties in correctly identifying imported products.**

239. Regarding the import tax rate to be used for the entry of the normal value, Anip stated that DECOM opted to consider the 16% rate, arguing that the increase is temporary, and that, given the extension of the tax, the 25% rate should be adopted.

240. He also mentioned that the comparison between the internalized normal value of the investigated origin and the price practiced by the domestic industry constitutes a prospective analysis, that is, projections of possible scenarios are made based on the information presented.

**5.6.1. Regarding DECOM's positioning**

241. The international freight values extracted from ComexStat by the petitioner for Thailand and Chinese Taipei refer to all imports classified under NCM 4011.10.00 carried out between January and December 2024. Thus, it is verified that these freight values, in addition to not referring to the dumping analysis period, include tires other than those subject to review. Furthermore, based on import data provided by the RFB for P5, it can be stated that less than [CONF.]% of the volume imported under NCM 4011.10.00 in 2024 refers to the product in question, that is, a relatively low volume. Even if the petitioner argues that there is no substantial variation in freight value between the different types of tires, if there is a database including only tires within the scope, which is the case, this should be the one chosen, as it will undoubtedly result in a more accurate freight value, in the understanding of DECOM.

242. Furthermore, for the purpose of calculating the freight to be used in the normal import value, the petitioner determined, for each investigated origin, the percentage between the freight and the FOB price of the imports and applied this percentage to the normal value under FOB conditions. However, the freight does not correlate with the value of the transported goods, but rather with their volume and specific weight. For this reason, distortions were observed in the freight values determined by the petitioner (US\$ 0.58/kg for Thailand and US\$ 0.45/kg for Chinese Taipei), when compared to the freight on imports of the similar product from other origins, given the discrepancy observed between the normal FOB value and the average FOB price of imports in the period adopted by the petitioner (January to December 2024), both for Thailand and Chinese Taipei.

243. Contrary to the petitioner's claim, it is understood that Brazilian imports originating from Thailand in P5 are representative for the purpose of estimating the freight to be used in the normal value entry, since, as already mentioned, they were imported from Thailand [RESTRICTED]. However, even if DECOM did not have this understanding, the average freight of Brazilian imports originating from Vietnam in P5 could be adopted as a freight estimate for Thailand, mainly due to two factors: these countries are in Southeast Asia and Vietnam was the largest exporter of the product under review to Brazil in P5. Furthermore, unlike the freight value suggested by the petitioner, these estimates refer to P5 and only to the product in question. Moreover, it is noted that the average freight per kilogram of imports from Thailand is equivalent to that of Vietnam to the second decimal place, which reinforces DECOM's understanding that these imports are representative for the purpose of freight calculation.

244. Regarding the representativeness of imports originating from Thailand in P5, it should be added that these imports were not considered representative for the purpose of determining export prices because their volume corresponds to only 0.2% of the Brazilian market, which does not allow for a fair comparison between the average prices of imports and domestic sales, since prices can be affected by the quantities sold. In the case of freight, however, provided there is a reasonable number of sales transactions and that these transactions are well distributed throughout the...



During this period, there are no significant distortions in the average freight cost due to the volume transported, since containers tend to be filled to their maximum capacity.

245. Although other factors cited by Anip may influence the freight cost, this does not explain the fact that the freight cost calculated by the petitioner for Thailand is approximately 3 times the freight costs calculated from RFB data for that origin and for geographically closer origins. It should be noted that the maximum variation between the freight costs calculated for the closest countries, namely Vietnam, Malaysia, and Indonesia, was only 6%, which demonstrates that the aforementioned factors do not substantially affect freight costs.

246. Regarding Anip's claim that its information is the best available because it is the only one in the records, it should be noted that DECOM has the prerogative to use the information it deems most appropriate.

247. The precedent cited by the petitioner, in which the RFB data was deemed inadequate to determine freight values, refers to a specific situation where there were difficulties in identifying the product under investigation based on the descriptions, which is not the case here.

248. Regarding the Import Tax, it should be noted that the reasons for considering the 16% rate for the entry of the normal value were not only the provisional nature of the 25% rate, but also the aforementioned fact that the domestic industry would practice higher prices in P5 if the Import Tax were 25% during that period, especially given that the prices practiced by the domestic industry in P5 were quite depressed.

249. Regarding the temporary nature of the tariff increase, it is worth recalling what was established in CAMEX Resolution No. 432/2022, published on December 21, 2022, which extended the definitive antidumping duty applied to Brazilian imports of n-butanol originating from South Africa and Russia:

294. (...) In this case, although the tariff reduction includes the NCM in which n-butanol is classified (2905.13.00), its effects are not taken into account for the analysis of the probability of continuation/resumption of dumping (mainly considering that, if the antidumping measure is extended, its validity period will significantly exceed the end currently foreseen for the tax relief).



295. Therefore, what should be considered when deciding whether or not to include a change in the rate of a given tax in the analysis of the probability of continuation/resumption of dumping is not the theoretical possibility of a future regulatory change, but whether the regulation that promoted it already provides, from the outset, a specific deadline for its effects to take place, as well as the deadline itself that may eventually be established.

250. For the purposes of objective comparison, if the normal value were introduced based on a prospective methodology, thus considering the 25% rate, a prospective price for the domestic industry should also be considered, adjusting this price based on the variation in Import Tax. However, in order to avoid unnecessary estimates, which could lead to greater imprecision in the analysis, DECOM believes that the actual values of P5 should be considered.

**5.7. Conclusion regarding the resumption of dumping**

251. In view of the foregoing, it was concluded, for the purposes of final determination, that there is a high probability that the practice of dumping will resume in exports from Thailand and Chinese Taipei to Brazil, should these origins export to Brazil in sufficient volume to cause injury to the domestic industry.

**6. Imports and the Brazilian Market**

252. This section will analyze Brazilian imports and the Brazilian market for automobile tires. The analysis period corresponds to the period considered for the purpose of analyzing the probability of continued/resumed damage to the domestic industry, as stipulated in §4 of article 48 of Decree No. 8,058 of 2013.

253. Thus, for the purpose of initiating the review, the period from July 2019 to June 2024 was considered, divided as follows:

P1 - July 2019 to June 2020;

P2 - July 2020 to June 2021;

P3 - July 2021 to June 2022;

P4 - July 2022 to June 2023; and

P5 - July 2023 to June 2024.

6.1. Imports

254. For the purpose of determining the values and quantities of imported automobile tires

For each period in Brazil, import data relating to sub-item 4011.10.00 of the [document/regulation] were used.

Common Nomenclature of Mercosur (NCM), provided by the RFB.

255. Although the petitioner indicated that imports of automobile tires

Wheeled or wheeled goods were included in the scope of the antidumping duty, they were not.

Import data for these sets was presented, but no other HS codes that might contain them were mentioned.

Imports of the product subject to the antidumping duty. Indeed, for the purposes of initiating this review, were

Only imports made under NCM code 4011.10.00 are considered.

256. Based on the detailed description of the goods, it was found that they are classified in

The aforementioned NCM sub-item refers to imports of automobile tires subject to antidumping duties and

Similar products exported by third countries. However, they are also classified under the same code.

tariffs apply to imports of other products, distinct from the product under review. For this reason, a review was conducted.

debugging the imports contained in this data, in order to obtain the information relating to

The product analyzed and compared to similar products.

257. Therefore, products that did not match the descriptions were disregarded.

presented in item 3.1, such as bias-ply tires and tires with rims, series and

distinct bands from those that characterize the product subject to the antidumping duty, which constituted the

Most imported products fall under this NCM code.

6.1.1. Of the volume of imports

258. The following table shows the total import volumes of automobile tires in

Period for analyzing the continuation/resumption of damage to the domestic industry.

Total Imports (in tons)						
[RESTRICTED]						
	P1	P2	P3	P4	P5	P1 - P5
Thailand	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Taiwan	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Total (under review)	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(67.4%)	(100.0%)	-	62.0%	+ 21,608.9%
Vietnam	100.0	126.4	101.6	623.8	1035.6	[RESTRICTED]
India	100.0	141.8	316.2	242.1	319.1	[RESTRICTED]
Mexico	100.0	34.2	17.5	80.9	143.7	[RESTRICTED]
Malaysia	100.0	48.2	0.1	64.5	86.3	[RESTRICTED]
Indonesia	100.0	54.1	39.5	62.2	63.5	[RESTRICTED]
Sri Lanka	100.0	-	-	-	-	[RESTRICTED]
China	100.0	71.9	275.0	938.0	1697.8	[RESTRICTED]
Argentina	100.0	31.0	26.8	10.7	30.6	[RESTRICTED]
Türkiye	100.0	119.5	1030.9	1439.0	500.8	[RESTRICTED]
Peru	100.0	-	-	-	-	[RESTRICTED]
South Korea	100.0	6806.0	7204.5	9138.8	3567.2	[RESTRICTED]
Others (*)	100.0	157.0	185.3	45.7	113.4	[RESTRICTED]
Total (except under analysis)	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(31.4%)	11.0%	71.8%	47.8%	+93.4%



Grand total	[RESTRIC	[RESTRIC	[RESTRIC	[RESTRIC	[RESTRIC	[RESTRIC
Variation	-	(31.4%)	11.0%	72.4%	47.8%	+94.2%
(*) Other Countries: Cambodia, Algeria, Russia, Ukraine, Philippines, Hong Kong, Japan, United States, Portugal, France, Poland, United Kingdom, Serbia, Czech Republic.						

259. It was observed that the indicator of the volume of Brazilian imports originating from the origins  
The number of exports investigated decreased by 67.4% from P1 to P2. There were no exports in P3. In the subsequent period,  
They occurred again, in a volume far exceeding that observed in the first two periods. Considering the  
Between P4 and P5, there was a growth of 62.0%. When considering the entire analysis period, the indicator  
The volume of Brazilian imports from the investigated origins revealed a positive variation of  
21,609.1% in P5, compared to P1.

260. Regarding the variation in volume of Brazilian imports of the product from other countries  
Origins throughout the period under analysis, there was a 31.4% reduction from P1 to P2, while from P2 to P3,  
From P3 to P4 and from P4 to P5, it is possible to detect an increase of 11.0%, 71.8%, and 47.8%, respectively.  
If we consider the entire series analyzed, the indicator of the volume of Brazilian imports of the product of  
Other sources showed an expansion of 93.4%, considered P5 in relation to the beginning of the evaluated period.  
(P1).

261. The variation in total Brazilian imports during the analyzed period followed the trend of  
behavior of imports from other origins, with a drop in the first interval followed by  
Continuous growth throughout the period: -31.4% from P1 to P2; 11% from P2 to P3; 72.4% from P3 to P4 and 47.8%  
From P4 to P5. Analyzing the entire period, total Brazilian imports of origin showed expansion.  
of the order of 94.2%, considered P5 in relation to P1

6.1.2. Value and price of imports

262. In order to make the analysis of the value of imports more uniform, considering that the  
International freight and insurance, depending on the origin, have a significant impact on the price.  
Due to competition among products entering the Brazilian market, the analysis was conducted on a CIF basis.  
[RESTRICED] .

263. The following tables show the evolution of the total value and CIF price of imports.  
of automobile tires during the analysis period for continuation/resumption of damage to the domestic industry.

Total Import Value (in CIF USD x 1,000)						
[RESTRICED]						
	P1	P2	P3	P4	P5	P1 - P5
Thailand	[RESTRIC	[RESTRIC	[RESTRIC	[RESTRIC	[RESTRIC	[RESTRIC
Taiwan	[RESTRIC	[RESTRIC	[RESTRIC	[RESTRIC	[RESTRIC	[RESTRIC
Total (under review)	[RESTRIC	[RESTRIC	[RESTRIC	[RESTRIC	[RESTRIC	[RESTRIC
Variation	-	(84.0%)	(100.0%)	-	73.8%	+ 21,512.6%
Vietnam	100.0	132.3	136.1	789.2	1147.0	[RESTRICED]
India	100.0	145.3	445.5	328.5	380.9	[RESTRICED]
Mexico	100.0	33.9	23.0	107.5	157.1	[RESTRICED]
Malaysia	100.0	47.7	0.1	88.8	111.1	[RESTRICED]
Indonesia	100.0	57.5	50.3	82.1	74.8	[RESTRICED]
Sri Lanka	100.0	-	-	-	-	[RESTRICED]
China	100.0	77.8	319.7	961.7	1593.6	[RESTRICED]
Argentina	100.0	28.9	26.5	13.2	32.2	[RESTRICED]
Türkiye	100.0	133.3	1300.0	1871.1	604.9	[RESTRICED]
Peru	100.0	-	-	-	-	[RESTRICED]
South Korea 100.0		6029.2	7692.3	9512.1	3881.3	[RESTRICED]
Others (*)	100.0	156.5	225.9	57.0	129.0	[RESTRICED]
Total (except under analysis)	100.0	65.4	92.1	159.2	205.8	[RESTRICED]



Variation	-	(34.6%)	40.9%	72.8%	29.2%	+105.8%
Grand total	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(34.6%)	40.9%	73.3%	29.3%	+106.4%
(*) Other Countries: Cambodia, Algeria, Russia, Ukraine, Philippines, Hong Kong, Japan, United States, Portugal, France, Poland, United Kingdom, Serbia, Czech Republic.						

264. It was observed that the CIF value indicator (US\$ thousand) of Brazilian imports from the origins

The investigated imports decreased by 84.0% from P1 to P2. In P3, these imports ceased to occur. During the periods

Subsequent events occurred again, and, considering the interval from P4 to P5, there was a growth of 73.8%.

If we consider the entire analysis period, the CIF value indicator (US\$ thousand) of Brazilian imports of

The investigated origins revealed a positive variation of 21,512.6% in P5, compared to P1.

265. Regarding the variation in CIF value (US\$ thousand) of Brazilian imports of the product of

Regarding other sources throughout the period under analysis, there was a 34.6% reduction from P1 to P2.

The following periods showed continuous growth: 40.9% from P2 to P3; 72.8% from P3 to P4; and 29.3% from P4 to P5.

Considering the entire series analyzed, the CIF value indicator (thousand US\$) of Brazilian imports of

Product from other sources showed an expansion of 105.8%, considered P5 in relation to the beginning of the

period evaluated (P1).

266. The variation in total CIF value (US\$ thousand) of Brazilian imports during the analyzed period.

It followed the trend of import behavior from other origins, with a drop in the first

interval and continuous growth in the others: -34.6% from P1 to P2; 40.9% from P2 to P3; 73.3% from P3 to

P4 and 29.3% from P4 to P5. Analyzing the entire period, total CIF value (thousand US\$) of imports.

Brazilian companies showed an expansion of approximately 106.4%, considered P5 in relation to P1.

267. Regarding the price, it was observed that:

Price of Total Imports (in CIF USD/t)						
[RESTRICTED]						
	P1	P2	P3	P4	P5	P1 - P5
Thailand	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Taiwan	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Total (under analysis)	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(51.0%)	(100.0%)	-	7.3%	(0.4%)
Vietnam	100.0	104.7	133.9	126.5	110.8	[RESTRICTED]
India	100.0	102.4	140.9	135.7	119.4	[RESTRICTED]
Mexico	100.0	99.1	132.0	133.0	109.3	[RESTRICTED]
Malaysia	100.0	99.0	144.4	137.7	128.7	[RESTRICTED]
Indonesia 100.0		106.3	127.3	131.9	117.9	[RESTRICTED]
Sri Lanka 100.0		-	-	-	-	[RESTRICTED]
China	100.0	108.2	116.2	102.5	93.9	[RESTRICTED]
Argentina 100.0		93.3	98.8	123.3	105.3	[RESTRICTED]
Türkiye	100.0	111.5	126.1	130.0	120.8	[RESTRICTED]
Peru	100.0	-	-	-	-	[RESTRICTED]
Other (*) 100.0		101.6	123.8	129.5	116.3	[RESTRICTED]
Total (except under analysis)	100.0	95.3	120.9	121.7	106.4	[RESTRICTED]
Variation	-	(4.7%)	26.9%	0.6%	(12.5%)	+6.4%
Grand Total [RESTRICTED]		[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(4.7%)	26.9%	0.5%	(12.5%)	+6.3%
(*) Too much Countries:	Cambodia, Algeria, Russia, Ukraine, Philippines, Hong Kong, Japan, United States, Portugal, France, Poland, United Kingdom, Serbia, Czech Republic.					



268. It was observed that the average price indicator (CIF US\$/t) of Brazilian imports of The number of origins investigated decreased by 51.0% from P1 to P2. No imports from these origins were recorded in P3. In subsequent periods, they occurred again, and, considering the interval from P4 to P5, there were growth of 7.3%. When considering the entire analysis period, the average price indicator (CIF US\$/t) Brazilian imports from the investigated origins showed a negative variation of 0.4% in P5. compared to P1.

269. Regarding the variation in the average price (CIF US\$/t) of Brazilian imports originating from Regarding other sources throughout the period under analysis, there was a 4.7% reduction from P1 to P2, while... From P2 to P3 and from P3 to P4, it is possible to detect an increase of 26.9% and 0.6%, respectively. From P4 to P5, the indicator suffered a drop of 12.5%. When considering the entire series analyzed, the average price indicator (CIF US\$/t) of Brazilian imports from other origins showed an expansion of 6.4%, considered P5 in relation to the beginning of the evaluated period (P1).

270. The variation in the average price of total Brazilian imports of origin during the period The analysis followed the trend observed in the prices of the other origins: a reduction of 4.7% from P1 to P2; followed by increases of 26.9% and 0.5% from P2 to P3 and from P3 to P4, respectively; From P4 to P5, There was a 12.5% decrease. Analyzing the entire period, the average price of total Brazilian imports was... The origin showed an expansion of approximately 6.3%, considered P5 in relation to P1.

6.1.3. The Brazilian market and the evolution of imports

271. To determine the size of the Brazilian automotive tire market, the following were considered: quantities, net of returns, sold by the domestic industry in the market, as well as imported quantities determined based on import data provided by the RFB, presented in the previous item.

272. For the purposes of initiating this review, it was considered that the Brazilian market and consumption The apparent national figures were equivalent, considering that there was no captive consumption by the petitioner.

From the Brazilian Market, Apparent National Consumption and the Evolution of Imports (in tons)						
[RESTRICTED]						
	P1	P2	P3	P4	P5	P1 - P5
Brazilian Market						
Brazilian Market {A+B+C}	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(2.5%)	(4.9%)	6.0%	(5.9%)	(7.5%)
A. Internal Sales - Domestic Industry	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(8.3%)	(13.7%)	(8.4%)	(30.3%)	(49.5%)
B. Internal Sales - Other Companies	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	19.3%	(1.8%)	(5.2%)	(20.5%)	(11.7%)
C. Total Imports C1. Imports	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
- Origins under Analysis	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(67.4%)	(100.0%)	-	62.0%	+ 21,608.9%
C2. Imports - Other Origins	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(31.4%)	11.0%	71.8%	47.8%	+93.4%
Participation in the Brazilian Market						
Sales Participation Internal Industry Domestic {A/(A+B+C)}	100.0	94.2	85.5	73.7	54.6	[RESTRICTED]
Sales Participation Internal Services from Other Companies {B/(A+B+C)}	100.0	122.4	126.4	112.9	95.4	[RESTRICTED]



Import Participation Totals {C/(A+B+C)}	100.0	70.3	82.1	133.3	209.7	[RESTRICTED]
Import Participation Origins under Analysis {C1/(A+B+C)}	100.0	0.0	-	100.0	200.0	[RESTRICTED]
Import Participation Other Origins {C2/(A+B+C)}	100.0	70.3	82.1	132.8	208.7	[RESTRICTED]
Representativeness of Imports from Origins under Analysis						
Market Share Brazilian {C1/(A+B+C)}	100.0	0.0	-	100.0	200.0	[RESTRICTED]
Variation	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Participation in Imports Totals {C1/C}	100.0	0.0	-	100.0	200.0	[RESTRICTED]
Variation	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
F. Production Volume National {F1+F2}	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(0.0 pp)	-	0.4 pp	0.0 pp	+ 0.4 pp
F1. Production Volume - Domestic Industry	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	4.2%	(4.6%)	(11.2%)	(23.6%)	(32.6%)
F2. Production Volume - Other Companies	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(0.0 pp)	-	0.1 pp	0.1 pp	+ 0.2 pp
Relationship with Volume of National Production {C1/F}	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(0.0 pp)	-	0.1 pp	0.1 pp	+ 0.2 pp



273. It was observed that the Brazilian tire market indicator decreased by 2.5% from P1 to P2 and 4.9% from P2 to P3. In subsequent periods, there was an increase of 6.0% from P3 to P4. Considering the interval from P4 to P5, there was a decrease of 5.9%. When considering the entire period of Analysis of the Brazilian automotive tire market indicator revealed a negative variation of 7.5% in P5, compared to P1.

274. It was observed that the indicator of participation of investigated origins in the Brazilian market [RESTRICTED] from P1 to P2, remaining [RESTRICTED] from P2 to P3. In subsequent periods, there was [RESTRICTED] increases from P3 to P4 and [RESTRICTED] increases from P4 to P5. When considering the entire period of Analysis of the indicator of participation of investigated origins in the Brazilian market revealed a positive variation. [RESTRICTED] in P5, compared to P1.

275. Regarding the variation in the market share of imports from other origins Brazilian [restricted] throughout the period under analysis, there was a reduction from P1 to P2. From P2 to P3 and from From P3 to P4, it is possible to detect an increase in [RESTRICTED] and [RESTRICTED], respectively. From P4 to P5, it was revealed that there had been an increase in [RESTRICTED] When considering the entire series analyzed, the indicator of The share of imports from other origins in the Brazilian market showed an expansion of [RESTRICTED] , considered P5 in relation to the beginning of the evaluated period (P1).

6.2. Conclusion regarding imports

276. During the period of investigation of continued/recurred injury, imports of Origins investigated in this review:

a) In absolute terms, there was growth, having gone from [RESTRICTED] t in P1 to [RESTRICTED] t in P5 (increase of [RESTRICTED], equivalent to 21,608.9%);



b) with respect to the Brazilian market, they remained practically stable given that the  
The share of these imports went from [RESTRICTED]% in P1 to [RESTRICTED]% in P5, having  
increased [RESTRICTED] pp; and

c) In relation to national production, there was proportional growth because, in P1, they represented  
[RESTRICTED] % of this production and, in P5, corresponded to [RESTRICTED] % of the total volume produced in  
country.

277. Import volumes from Thailand and Chinese Taipei were considered insignificant.  
as per §3 of Article 31 of Decree No. 8,058 of 2013, since they represented [RESTRICTED]% of  
Brazilian imports and [RESTRICTED] % of the Brazilian market in P5. Additionally, it is reiterated that not  
There were imports in P5 originating from Chinese Taipei.

7. DOMESTIC INDUSTRY INDICATORS

7.1. Domestic industry indicators

278. In accordance with the provisions of Article 108 of Decree No. 8,058 of 2013, the determination that  
The extinction of the right would very likely lead to the continuation or resumption of the harm and should be based on...  
objective examination of all relevant factors, including the state of the domestic industry during the  
definitive validity of the right and the other factors indicated in article 104 of the Brazilian Regulation.

279. The analysis period for the domestic industry indicators comprised the same  
periods used in the analysis of imports.

280. As demonstrated in item 4, in accordance with the provisions of article 34 of Decree No. 8,058, of  
In 2013, the domestic industry was defined as the set of production lines for automobile tires.  
from the companies Bridgestone, Continental and Pirelli, which together accounted for 41% of production.  
national price of the similar domestic product, in P5. Therefore, the indicators considered in this document  
They reflect the results achieved by the aforementioned production lines.

281. For a proper assessment of the evolution of data in national currency, presented by  
For the domestic industry, current values were updated based on the Broad Producer Price Index.  
- Origin - Industrial Products (IPA-OG-PI), from the Getúlio Vargas Foundation, [RESTRICTED].

282. According to the methodology applied, the values in current reais for each period  
were divided by the average price index for the period, and the result was multiplied by the index of  
Average prices of P5. This methodology was applied to all monetary values in reais presented.

7.1.1. On the global evolution of the domestic industry

7.1.1.1. Sales and market share indicators in Brazil

283. The following table presents, among other information, the sales of the domestic industry of  
Self-manufactured car tires intended for the domestic and export markets, liquid.  
of returns, as reported by the petitioner. As there was no industrialization for third parties.  
(toling) or captive consumption, apparent national consumption (ANC) is considered identical to the market  
Brazilian.

From the Sales and Market Share Indicators in Brazil and in Apparent National Consumption (in tons)						
[RESTRICTED]						
	P1	P2	P3	P4	P5	P1 - P5
Sales Indicators						
A. Total Sales From the Domestic Industry	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(7.4%)	(12.9%)	(9.9%)	(30.0%)	(49.1%)
A1. Sales in the Market Internal	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(8.3%)	(13.7%)	(8.4%)	(30.3%)	(49.5%)
A2. Sales in the Market External	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	18.5%	5.3%	(37.6%)	(19.9%)	(37.6%)
Brazilian Market and Apparent National Consumption (ANC)						

B. Brazilian Market	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(2.5%)	(4.9%)	6.0%	(5.9%)	(7.5%)
C. CNA	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(2.5%)	(4.9%)	6.0%	(5.9%)	(7.5%)
Representation of Sales in the Domestic Market						
Participation in Sales Totals {A1/A}	100.0	99.1	98.2	99.8	99.3	
Variation	-	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Market Share Brazilian {A1/B}	100.0	94.2	85.5	73.7	54.6	
Variation	-	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Participation in the CNA {A1/C}	100.0	94.2	85.5	73.7	54.6	
Variation	-	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Prepared by: DECOM						

284. It was observed that the indicator of domestic industry sales (t) destined for the market

Internal costs decreased continuously throughout the period: 8.3% from P1 to P2; 13.7% from P2 to P3; 8.4% from P3 for P4 and 30.3% from P4 to P5. When considering the entire analysis period, the sales indicator of domestic industry (t) destined for the domestic market revealed a negative variation of 49.5% in P5, compared to P1.

285. With regard to the variation in sales of the domestic industry (t) destined for the market

External factors throughout the period under analysis showed an increase of 18.5% from P1 to P2 and of 5.3% from P2 to P3. From P3 to P4 and from P4 to P5, there was a decrease of 37.6% and 19.9%, respectively. When considering For the entire series analyzed, the indicator of domestic industry sales (t) destined for the foreign market It showed a contraction of 37.6%, considered P5 in relation to the beginning of the evaluated period (P1).



286. It should be noted that the representation of external sales of the domestic industry was, in maximum, [RESTRICTED] % of the total over the period under analysis.

287. It was observed that the indicator of the share of domestic industry sales in

The Brazilian market also decreased continuously: [RESTRICTED] pp from P1 to P2; [RESTRICTED] pp of P2 to P3; [RESTRICTED] pp from P3 to P4 and [RESTRICTED] pp from P4 to P5. When considering the entire period Based on the analysis, the indicator of domestic industry sales participation in the Brazilian market revealed negative variation of [RESTRICTED] pp in P5, compared to P1.

7.1.1.2. Production, capacity and inventory indicators

288. The following table presents, among other information, the production volume of the product. similar manufactured by the domestic industry, as reported by the petitioner.

From the Production, Installed Capacity and Inventory Indicators (in tons)						
[RESTRICTED]						
	P1	P2	P3	P4	P5	P1 - P5
Production Volumes						
A. Production Volume - Similar Product	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(8.3%)	(7.6%)	(17.9%)	(27.7%)	(49.7%)
B. Production Volume - Other Products	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	19.9%	9.1%	(5.2%)	(25.2%)	(7.2%)
in Installed Capacity						
D. Installed Capacity Effective	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Variation	-	1.7%	(6.2%)	(7.1%)	(14.3%)	(24.0%)

E. Degree of Occupation {(A+B)/D}	100.0	106.1	116.8	114.0	98.5	[CONF.]
Inventory	-	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Variation						
F. Inventory	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(6.5%)	63.7%	(13.8%)	(0.6%)	+31.2%
G. Relationship between Inventory and Production Volume {E/A}	100.0	101.1	180.7	188.6	260.2	[RESTRICTED]
Variation	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Prepared by: DECOM						
Source: RFB and Domestic Industry						

289. Similar to domestic sales, the volume indicator was observed to

Production of similar products by the domestic industry decreased steadily over the period:

8.3% from P1 to P2; 7.6% from P2 to P3; 17.9% from P3 to P4 and 27.7% from P4 to P5. When considering the entire

During the analysis period, the production volume indicator for the similar product in the domestic industry revealed

A negative variation of 49.7% in P5, compared to P1.

290. The effective installed capacity, when considering the extremes of the analysis period of

The review showed a 24.0% reduction in P5 compared to P1, with the largest drop occurring...

in the last period, with a reduction of 14.3% compared to the previous period.

291. It was observed that the indicator of the degree of utilization of installed capacity increased.

[CONFIDENTIAL] pp from P1 to P2 and [CONFIDENTIAL] pp from P2 to P3. In subsequent periods,

There was a reduction of [CONFIDENTIAL] pp from P3 to P4 and [CONFIDENTIAL] pp from P4 to P5. When

Considering the entire analysis period, the indicator of the degree of utilization of installed capacity revealed

A negative variation of 1.0 pp in P5, compared to P1.

292. It was observed that the indicator of ending inventory volume decreased by 6.5% from P1 to P2 and

It increased by 63.7% from P2 to P3. In subsequent periods, there was a reduction of 13.8% from P3 to P4, and

Considering the interval from P4 to P5, there was a decrease of 0.6%. When considering the entire period of

Analysis showed that the final inventory volume indicator revealed a positive variation of 31.2% in P5.

compared to P1.

293. It was observed that the ending inventory/production ratio indicator increased over time.

Continuous analysis period: [RESTRICTED] pp from P1 to P2; [RESTRICTED] pp from P2 to P3;

[RESTRICTED] pp from P3 to P4 and [RESTRICTED] pp from P4 to P5. When considering the entire analysis period,

The ending inventory/production ratio indicator showed a positive variation of [RESTRICTED] pp in P5.

compared to P1.

7.1.1.3. Employment, productivity and wage bill indicators

294. The following table presents, among other information, employment indicators,

Productivity and wage bill of the domestic industry, as reported by the petitioner.

Regarding Employment, Productivity, and the Wage Bill						
[CONFIDENTIAL] / [RESTRICTED]						
	P1	P2	P3	P4	P5	P1 - P5
Job ____						
A. Number of Employees - Total Variation	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	
A1. Number	-	(15.3%)	1.1%	(18.9%)	(25.9%)	(48.5%)
of Employees - Production Variation A2. Number	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	
of	-	(15.2%)	1.5%	(20.6%)	(26.2%)	(49.5%)
Employees - Administration and Sales Variation	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	
	-	(16.3%)	(2.0%)	(3.6%)	(24.3%)	(40.1%)
Productivity (in tons)						
B. Productivity per Employee Volume of Production (similar product) / {A1}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	

Variation	-	8.2%	(8.9%)	3.4%	(2.1%)	(0.3%)	
Total Wages (in Thousands of Reais)							
C. Total Payroll	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	
Variation	-	(28.3%)	(19.0%)	(0.2%)	(16.5%)	(51.6%)	
C1. Wage Bill - Production Variation	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	
	-	(27.4%)	(20.0%)	(2.1%)	(15.7%)	(52.1%)	
C2. Payroll - Administration and Sales	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	
Variation	-	(31.9%)	(14.5%)	7.7%		(19.4%)	(49.5%)
Prepared by: DECOM							
Source: RFB and Domestic Industry							

295. It was observed that the indicator of the number of employees working on the production line It decreased by 15.2% from P1 to P2 and increased by 1.5% from P2 to P3. In subsequent periods, there was a reduction. from 20.6% from P3 to P4 and from 26.2% from P4 to P5. When considering the entire analysis period, the indicator The number of employees working on the production line showed a negative variation of 49.5% in P5. compared to P1.

296. Regarding the variation in the number of employees working in administration and sales Throughout the period under analysis, there was a continuous reduction: from 16.3% from P1 to P2; from 2% from P2 to P3; 3.6% from P3 to P4; and 24.3% from P4 to P5. When considering the entire series analyzed, the indicator of The number of employees working in administration and sales contracted by 40.1%. considered P5 in relation to the beginning of the evaluated period (P1).

297. Assessing the variation in the total number of employees during the analyzed period, from P1 to P2 shows a decrease of 15.3%, with an increase of 1.1% in the following period, from P2 to P3. From P3 to From P4 to P5, there was a reduction of 18.9% and 25.9%, respectively. Analyzing the entire period, the total quantity of The number of employees showed a contraction of approximately 48.5%, considered P5 in relation to P1.

298. It was observed that the indicator of productivity per employee linked to production fluctuated. During the period: it grew 8.1% from P1 to P2 and decreased 8.8% from P2 to P3. In subsequent periods, There was a 3.3% increase from P3 to P4, and, considering the interval from P4 to P5, there was a decrease of 2.1%. When considering the entire analysis period, the indicator of productivity per employee linked to Production showed a negative variation of 0.3% in P5, compared to P1.

299. It was observed that the wage bill indicator for production line employees It decreased steadily throughout the analysis period: 27.4% from P1 to P2; 20.0% from P2 to P3; 2.1% from P3 to P4 and 15.7% from P4 to P5. When considering the entire analysis period, the mass indicator The wages of production line employees showed a negative variation of 52.1% in P5. compared to P1.

300. Regarding the variation in the total pay of administrative and sales employees to Over the course of the period under analysis, there was a reduction of 31.9% from P1 to P2 and of 14.5% from P2 to P3. From P3 to In P4, there was growth of 7.7%. From P4 to P5, the indicator suffered a drop of 19.4%. When considering the entire... In the series analyzed, the payroll indicator for administrative and sales employees showed... A contraction of 49.5%, considered P5 in relation to the beginning of the evaluated period (P1).

301. The total payroll for all employees in the period analyzed followed the trend of the payroll. Wages for production employees, with continuous declines: from 28.3% from P1 to P2; from 19.0% from P2 to P3; from 0.2% from P3 to P4 and from 16.5% from P4 to P5. Analyzing the entire period, total payroll The number of employees showed a contraction of approximately 51.6%, considered P5 in relation to P1.

7.1.2. Financial indicators of the domestic industry

7.1.2.1. Net revenue and weighted average prices

302. Net revenues earned by the domestic industry refer to net sales of similar product of own manufacture, already deducting rebates, discounts, taxes and returns, as well such as domestic freight expenses.

From Net Revenue and Weighted Average Prices
[CONFIDENTIAL]/ [RESTRICTED]





	P1	P2	P3	P4	P5	P1 - P5
<u>Net Revenue (in Thousands of Reais)</u>						
A. Total Net Revenue Variation	[CONF.]	[CONF.]	[CON[CONF.] [CONF.]	[CONF.]	[CONF.]	[CONF.]
A1. Net	-	(12.1%)	(4.8%)	0.6%	(33.6%)	(44.1%)
Revenue Domestic Market	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(12.9%)	(4.6%)	1.6%	(34.1%)	(44.4%)
Participation {A1/A}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
A2. Net Revenue Foreign Market	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Variation	-	10.8%	(10.4%)	(21.5%)	(17.4%)	(35.6%)
Participation {A2/A}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Weighted Average Prices (in Reais/t)						
B. Price in the Domestic Market {A1/Sales in the Market Internal}	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(5.1%)	10.6%	10.9%	(5.5%)	+10.1%
C. Market Price External {A2/Sales in the Market External}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Variation	-	(6.5%)	(15.0%)	25.7%	3.2%	+3.1%
Prepared by: DECOM						

303. It was observed that the net revenue indicator, in updated reais, relating to sales

In the domestic market, there was a decrease of 12.9% from P1 to P2 and 4.6% from P2 to P3. In subsequent periods, there was...

There was a 1.6% increase from P3 to P4, and considering the interval from P4 to P5, there was a decrease of 34.1%. When...

Considering the entire analysis period, the net revenue indicator, in updated reais, refers to

Sales in the domestic market showed a negative variation of 44.4% in P5, compared to P1.



304. With regard to the variation in net revenue obtained from exports of the product similar to

Throughout the period under analysis, there was a 10.8% increase from P1 to P2, followed by a decrease in the remaining values.

intervals: 10.4% from P2 to P3; 21.5% from P3 to P4; 17.4% from P4 to P5. When considering the entire series.

Upon analysis, the indicator of net revenue obtained from exports of the similar product showed...

A contraction of 35.6%, considered P5 in relation to the beginning of the evaluated period (P1).

305. Evaluating the variation in total net revenue during the analyzed period, from P1 to P2 and from P2

For P3, there was a decrease of 12.1% and 4.8%, respectively. From P3 to P4, there was growth of

0.6%. From P4 to P5, the indicator revealed a contraction of 33.6%. Analyzing the entire period, net revenue

The total showed a contraction of approximately 44.1%, considered P5 in relation to P1.

306. It was observed that the average selling price indicator in the domestic market decreased by 5.1%.

from P1 to P2 and increased by 10.6% and 10.9% from P2 to P3 and from P3 and P4. Considering the interval from P4 to

P5, there was a decrease of 5.5%. When considering the entire analysis period, the average price indicator of

Sales in the domestic market showed a positive variation of 10.1% in P5, compared to P1.

307. With regard to the variation in the average selling price to the foreign market over the

During the period under analysis, there was a 6.5% reduction in P1 and P2, and a 15% reduction from P2 to P3. From P3 to P4 and from P4 to

P5 showed growth of 25.7% and 3.2%, respectively. When considering the entire series analyzed, the

The average selling price indicator for the foreign market showed an expansion of 3.1%, considered P5.

in relation to the beginning of the evaluated period (P1).

7.1.2.2. Results and Margins

308. The following table demonstrates the results and profit margins obtained from the sale of tires.

of automobiles by the domestic industry.

Statement of Results in the Domestic Market and Profit Margins
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[CONFIDENTIAL] / [RESTRICTED]						
	P1	P2	P3	P4	P5	P1 - P5
Income Statement (in Thousands of Reais)						
A. Net Revenue Domestic Market	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(12.9%)	(4.6%)	1.6%	(34.1%)	(44.4%)
B. Cost of Goods Sold CPV	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Variation	-	(18.8%)	(6.2%)	3.8%	(18.9%)	(35.8%)
C. Gross Profit {AB}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Variation	-	25.6%	2.6%	(7.1%)	(100.3%)	(100.3%)
D. Operating Expenses Variation	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
D1. General	-	(41.1%)	28.1%	9.5%	(8.0%)	(24.0%)
Expenses and Administrative	100.0	76.6	67.2	83.8	60.7	[CONF.]
D2. Sales Expenses	100.0	63.2	53.3	64.8	48.0	[CONF.]
D3. Financial Result (RF) 100.0		25.3	222.6	213.1	243.5	[CONF.]
D4. Other Expenses (Revenues) Operational (OD)	-100.0	-112.2	-6.7	-48.9	26.2	[CONF.]
E. Operating Result {CD}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Variation	-	493.2%	(27.1%)	(41.1%)	(450.9%)	(492.8%)
F. Operating Result (except RF) {C-D1-D2-D4}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Variation	-	623.1%	(15.0%)	(35.4%)	(343.9%)	(601.3%)
G. Operating Result (except RF and OD) {C-D1-D2}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Change in	-	192.0%	50.5%	(57.2%)	(450.4%)	(107.6%)
Profit Margins (%)						
H. Gross Margin {HERE}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Variation	-	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
I. Operating Margin {E/A}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
J. Operating	-	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Margin Variation (except RF) {FAN}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Variation	-	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
K. Operating Margin (except RF and OD) {G/A}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Variation	-	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]

309. Regarding the change in gross profit of the domestic industry over the period in Analysis showed an increase of 25.6% from P1 to P2 and of 2.6% from P2 to P3. From P3 to P4 and from P4 to P5, There were decreases of 7.1% and 100.3%, respectively. When considering the entire series analyzed, the The gross profit indicator for domestic industry showed a contraction of 100.3%, considered P5 in with respect to the beginning of the evaluated period (P1).

310. Evaluating the variation in operating results during the analyzed period, from P1 to P2 there is an increase of 493.2%, followed by continuous decreases in the following intervals: 27.1% from P2 to P3; 41.1% from P3 to P4; from P4 to P5, respectively, by 450.9%. Analyzing the entire period, the result... Operations showed a contraction of approximately 492.8%, considering P5 in relation to P1.

311. It was observed that the operating result indicator, excluding the financial result, It also exhibited the same behavior. An increase from P1 to P2 of 623.1%, followed by decreases. From P2 In P3, P3 to P4, and P4 to P5, there was a reduction of 15.0%, 35.4%, and 343.9%, respectively. When considering Throughout the analysis period, the operating result indicator, excluding the financial result, revealed negative variation of 601.3% in P5, compared to P1.

312. With regard to the variation in operating income, excluding financial results and other Over the period under analysis, expenses increased by 192.0% from P1 to P2 and by 50.5% from P2 to P2. P3. From P3 to P4 and from P4 to P5, there was a decrease of 57.2% and 450.4%, respectively. When considering the entire series. analyzed, the operating result indicator, excluding financial results and other expenses, It showed a contraction of 107.6%, considered P5 in relation to the beginning of the evaluated period (P1).

313. It was observed that the gross margin indicator grew [CONFIDENTIAL] pp from P1 to P2. and [CONFIDENTIAL] pp from P2 to P3. In subsequent periods, there was a reduction of [CONFIDENTIAL] pp from P3 to P4 and from [CONFIDENTIAL] pp from P4 to P5. When considering the entire analysis period, the The gross margin indicator revealed a negative variation of [CONFIDENTIAL] pp in P5, compared to P1.

314. Regarding the variation in operating margin over the period under analysis, there was [CONFIDENTIAL] pp increase from P1 to P2, followed by decreases in the remaining intervals. From P2 to P3 From P3 to P4, it is possible to detect a retraction of [CONFIDENTIAL] pp and [CONFIDENTIAL] pp. respectively. From P4 to P5, it was revealed that there had been a drop of [CONFIDENTIAL] pp. When considering Throughout the analyzed series, the operating margin indicator showed a contraction of [CONFIDENTIAL] pp. considered P5 in relation to the beginning of the evaluated period (P1).

315. Assessing the variation in operating margin, excluding financial results, during the period Upon analysis, an increase of [CONFIDENTIAL] pp is observed from P1 to P2. In the other intervals, there was a decrease. from [CONFIDENTIAL] pp from P2 to P3; [CONFIDENTIAL] pp from P3 to P4 and [CONFIDENTIAL] pp from P4 for P5. Analyzing the entire period, the operating margin, excluding financial results, showed contraction of [CONFIDENTIAL] pp, considered P5 in relation to P1.

316. It was observed that the operating margin indicator, excluding financial results and Other expenses grew [CONFIDENTIAL] pp from P1 to P2 and [CONFIDENTIAL] pp from P2 to P3. In In subsequent periods, there was a reduction of [CONFIDENTIAL] pp from P3 to P4 and [CONFIDENTIAL] pp from P4 to P5. When considering the entire analysis period, the operating margin indicator, excluding the Financial results and other expenses revealed a negative variation of [CONFIDENTIAL] pp in P5. compared to P1.



Statement of Results in the Domestic Market by Unit (R\$/t)						
[CONFIDENTIAL] / [RESTRICTED]						
	P1	P2	P3	P4	P5	P1 - P5
A. Net Revenue Domestic Market	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Variation	-	(5.1%)	10.6%	10.9%	(5.5%)	+10.1%
B. Cost of Goods Sold - CPV	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Variation	-	(11.5%)	8.6%	13.4%	16.5%	+27.0%
C. Gross Profit {AB}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Variation	-	36.9%	18.9%	1.4%	(100.4%)	(100.6%)
D. Operating Expenses Variation	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
D1. General Expenses and Administrative	-	(35.8%)	48.4%	19.5%	32.1%	+ 50.4%
	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
D2. Sales Expenses	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
D3. Financial Result (FR) [CONF.]		[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]

D4. Other Expenses (Revenues) Operational (OD)	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
E. Operating Result {CD}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Variation	-	528.7%	(15.5%)	(35.6%)	(603.6%)	(1,073.6%)
F. Operating Result (except RF) {C-D1-D2-D4}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Variation	-	670.4%	(1.5%)	(29.4%)	(450.0%)	(1,288.3%)
G. Operating Result (except RF and OD) {C-D1-D2}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Variation	-	200.3%	74.3%	(53.3%)	(602.9%)	(311.0%)
Prepared by: DECOM						
Source: RFB and Domestic Industry						

317. It was observed that the unit CPV indicator decreased by 11.5% from P1 to P2 and increased by 8.6% from P2 to P3. In subsequent periods, there was an increase of 13.4% from P3 to P4 and of 16.5% from P4 to P5. Considering the entire analysis period, the unit CPV indicator showed a positive variation of 27.0% in P5, compared to P1.

318. Regarding the variation in gross unit profit over the period under analysis, there was increase of 36.9% from P1 to P2, 18.9% from P2 to P3, and 1.4% from P3 to P4. From P4 to P5, the The indicator suffered a drop of 100.4%. When considering the entire series analyzed, the gross profit indicator... The unit price showed a contraction of 100.6%, considered P5 in relation to the beginning of the evaluated period (P1).

319. Evaluating the variation in unit operating income during the analyzed period, from P1 to P2 There is an increase of 528.7%. It is also possible to observe a decrease of 15.5% from P2 to P3, while... From P3 to P4, there was a reduction of 35.6%. From P4 to P5, the indicator revealed a contraction of 603.6%. Analyzing the entire period, the unit operating result showed a contraction of approximately 1,073.6%. considered P5 in relation to P1.

320. It was observed that the unit operating result indicator, excluding the result Financial, it experienced an increase of approximately 670.4% from P1 to P2 and a decrease of 1.5% from P2 to P3. In In subsequent periods, there was a 29.4% reduction from P3 to P4, and considering the interval from P4 to P5 There was a decrease of 450.0%. When considering the entire analysis period, the outcome indicator... Unit operating income, excluding financial results, showed a negative variation of 1,288.3% in P5. compared to P1.

321. With regard to the variation in unit operating income, excluding financial results and Other expenses, over the period under analysis, increased by 200.3% from P1 to P2, while, From P2 to P3, an increase of 74.4% can be detected. From P3 to P4, there was a decrease of 53.3%, and from P4 For P5, the indicator suffered a drop of 602.9%. When considering the entire series analyzed, the indicator of The unit operating result, excluding financial results and other expenses, showed a contraction. 311.0%, considered P5 in relation to the beginning of the evaluated period (P1).

7.1.2.3. Cash flow, return on investment, and fundraising capacity

322. Regarding the following indicators, it should be noted that they refer to the total activities of domestic industry and not only operations related to automobile tires.

Cash Flow, Return on Investment, and Ability to Raise Funds						
[CONFIDENTIAL] / [RESTRICTED]						
	P1	P2	P3	P4	P5	P1 - P5
Cash flow						
A. Flow of Box	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]
Variation	-	(47.5%)	19.4%	(140.2%)	(139.2%)	(160.2%)
Return on Investment						

B. Profit Liquid	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]
Variation	-	2,864.8%	(24.9%)	10.5%	(125.0%)	(715.8%)
C. Total Assets	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]
Variation	-	(25.7%)	(14.6%)	7.0%	9.4%	(25.6%)
D. Return on Investment Total (ROI)	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]
Variation	-	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]
Ability to Raise Funds						
E. Index of Liquidity General (ILG)	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	-
Variation	-	20.8%	6.9%	43.5%	(2.2%)	+81.3%
F. Index of Liquidity Current (ILC)	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	-
Variation	-	(5.0%)	23.7%	14.9%	-	+35.0%
Prepared by: DECOM						
Source: RFB and Domestic Industry						
Note: ROI = Net Profit / Total Assets; Current Ratio = Current Assets / Current Liabilities; ILG = (Current Assets + Long-Term Realizable Assets) / (Current Liabilities + Non-Current Liabilities)						

323. It was observed that the total net cash generated in the industry's activities... Domestic consumption decreased by 47.5% from P1 to P2 and increased by 19.4% from P2 to P3. In subsequent periods, There was a 140.2% reduction from P3 to P4, and considering the interval from P4 to P5 there was a decrease of 139.2%. Considering the entire analysis period, the total net cash generated from activities is 139.2%. The domestic industry revealed a negative variation of 160.2% in P5, compared to P1.



324. It was observed that the industry's rate of return on investment indicator Domestic growth increased [CONFIDENTIAL] pp from P1 to P2 and decreased [CONFIDENTIAL] pp from P2 to P3. In In subsequent periods, there was an increase of [CONFIDENTIAL] pp from P3 to P4 and a decrease of [CONFIDENTIAL] pp from P4 to P5. When considering the entire analysis period, the rate indicator of Return on investment for domestic industry showed a negative variation of [CONFIDENTIAL] pp in P5, compared to P1.

325. It was observed that the general liquidity indicator grew by 20.8% from P1 to P2 and increased 6.9% from P2 to P3. In subsequent periods, there was an increase of 43.5% from P3 to P4, and considering the In the interval between P4 and P5, there was a decrease of 2.2%. When considering the entire analysis period, the indicator Overall liquidity showed a positive variation of 81.3% in P5, compared to P1.

326. Regarding the variation in current liquidity over the period under analysis, there was A 5.0% reduction from P1 to P2, while from P2 to P3, an increase of 23.7% can be detected. From P3 to P4, there was a growth of 14.9%, and between P4 and P5, the indicator did not undergo significant variation. When se Considering the entire series analyzed, the current liquidity indicator showed an expansion of 35.0%. considered P5 in relation to the beginning of the evaluated period (P1).

7.1.2.4. On the growth of the domestic industry

327. The volume of sales from the domestic industry to the domestic market in P5 was lower than The sales volume recorded in P1 ([RESTRICTED]%) was also lower than the volume observed. in P4 ([RESTRICTED] %).

328. The reduction in the volume of sales in the domestic industry, in absolute terms, occurred despite the growth of the Brazilian market, which showed an expansion of ([RESTRICTED] %) from P1 to P5, This growth was driven by an increase in the volume of imports from other sources. ([RESTRICTED]%) during the same period, since imports from the investigated origins were not representative.



329. Thus, the domestic industry experienced a reduction in its market share. Brazilian automotive tire market from P1 to P5 ([RESTRICTED] pp), having recorded its lowest participation in the last analysis period ([RESTRICTED] % in P5).

330. Thus, it can be concluded that, throughout the period analyzed, the domestic industry presented a decline in its sales in the Brazilian market, both in absolute terms and in relation to the market. Brazilian car tire manufacturer.

7.1.3. Factors affecting domestic prices

7.1.3.1. Costs and the cost/price ratio

331. The following table shows the cost of production and a comparison between price and cost. from the domestic industry.

Regarding Costs and the Cost/Price Ratio						
[CONFIDENTIAL] / [RESTRICTED]						
	P1	P2	P3	P4	P5	P1 - P5
Production Costs (in R\$/t)						
Production Cost (in BRL/t) {A + B}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	
Variation	-	(15.5%)	2.5%	12.9%	1.7%	(0.6%)
A. Variable Costs	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	
A1. Raw Material	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	
A2. Utilities	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	
A3. Other Variable Costs	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	
B. Fixed Costs	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	
Unit Cost (in R\$/t) and Cost/Price Ratio (%)						
C. Unit Production Cost [CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	
Variation	-	(15.5%)	2.5%	12.9%	1.7%	(0.6%)
D. Price in the Domestic Market [CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	
Variation	-	(5.1%)	10.6%	10.9%	(5.5%)	+ 10.1%
E. Cost/Price Ratio {CD}	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]	-
Variation	-	[CONF.]	[CONF.]	[CONF.]	[CONF.]	[CONF.]
Prepared by: DECOM						
Source: RFB and Domestic Industry						

332. It was observed that the unit cost indicator decreased by 15.5% from P1 to P2 and increased 2.5% from P2 to P3. In subsequent periods, there was an increase of 12.9% from P3 to P4 and of 1.7% from P4 to P5. Considering the entire analysis period, the unit cost indicator showed a negative variation. 0.6% in P5, compared to P1.

333. It was observed that the indicator of the share of production cost in the selling price [CONFIDENTIAL] pp decreased from P1 to P2 and [CONFIDENTIAL] pp decreased from P2 to P3. During the periods Subsequently, there was an increase of [CONFIDENTIAL] pp from P3 to P4 and of [CONFIDENTIAL] pp from P4 for P5. When considering the entire analysis period, the indicator of the share of production costs in The selling price showed a negative variation of [CONFIDENTIAL] pp in P5, compared to P1.

7.2. Conclusion regarding domestic industry indicators

334. Based on the analysis of the indicators presented, it was found that, during the analysis period of probability of recurrence of damage, the volume of sales in the domestic market of the domestic industry It recorded a reduction of 49.1%, from P1 to P5, reaching its lowest level in P5, with a volume of [RESTRICTED] t.

335. In addition to the absolute reduction in the volume of domestic sales in the industry, there was decline in the share of such sales in the Brazilian market from both P1 to P5 ([RESTRICTED] pp), as well as P4 to P5 ([RESTRICTED] pp), so that the domestic industry reached its lowest market share.



Brazilian in P5. The drop in sales volume was reflected in production volume, which showed a reduction not only from P1 to P5 (49.7%), but also from P4 to P5 (27.7%).

336. The number of employees involved in production decreased by 49.5% from P1 to P5, and from P4 to P5 there was a decrease of (26.2%). Considering that there was a significant reduction in the number of employees involved in production throughout the analysis period, following the reduction in the level of production, productivity per employee decreased by 2.1% from P4 to P5, and in this latter period, this indicator was practically equivalent to the value observed in P1.

337. Net revenue obtained by the domestic industry from sales to the domestic market decreased by 44.4% from P1 to P5, driven by a reduction in sales volume, despite a 10.1% increase in the average price of such sales during the same period. A reduction in the cost/price ratio was observed from P1 to P5 ([CONFIDENTIAL]pp) since there was a slight reduction in the unit production cost (0.6% from P1 to P5) concomitant with the increase in prices charged by the domestic industry in domestic sales during the same period.

338. Gross profit grew from P1 to P3, followed by a sharper decline in subsequent periods, reaching a negative value in P5. The gross margin showed a similar trend, with a reduction of [CONFIDENTIAL] pp from P1 to P5.

339. The operating result was negative not only in P5, but also in P1. However, the operating loss in P5 was almost 500% greater than in P1. When financial results and other expenses are disregarded, a similar evolution is observed in the operating result, with a negative value in P1 and P5 and a much larger loss in the last period.

340. Thus, it can be seen that there was damage to the domestic industry throughout the analyzed period. However, considering that the investigated imports were not representative, this damage cannot be attributed to those imports. Therefore, the next item will assess the probability of a recurrence of damage to the domestic industry resulting from the investigated imports.

**8. CONTINUATION OR RESUMPTION OF THE DAMAGE**

341. Article 108 in conjunction with Article 104 of Decree No. 8,058 of 2013 establishes that the determination that the termination of the duty will very likely lead to the continuation or resumption of injury to the domestic industry must be based on an objective examination of all relevant factors, including: the situation of the domestic industry during the period of validity of the duty (item 8.1); the behavior of imports (item 8.2); the comparison between the price of the product subject to the antidumping duty and the price of the similar product in the Brazilian market (item 8.3); the impact of the imports subject to the antidumping duty on the domestic industry (item 8.4); changes in market conditions in the exporting country (item 8.5); and possible other factors causing the continuation of the injury and non-attribution (item 8.6).

**8.1. The situation of the domestic industry during the period of validity of the law**

342. Article 108 in conjunction with item I of Article 104 of Decree No. 8,058 of 2013 establishes that, for the purposes of determining whether injury to the domestic industry has continued or resumed due to imports subject to antidumping duties, the situation of the domestic industry during the period the duty was in effect must be examined.

343. As explained in item 7 of this document, it was found that the sales volume in the domestic market of the domestic industry fell continuously throughout the entire analysis period, with a more pronounced reduction from P4 to P5 (30.0%). From P1 to P5, an accumulated drop of 49.1% was observed.

344. This significant drop observed in the volume of domestic sales contributed to a substantial reduction in the domestic industry's share of the Brazilian market. This share, which represented [RESTRICTED]% in P1, fell to [RESTRICTED] % in P5.

345. Net revenue from domestic sales also showed a significant reduction.  
From P1 to P5, a decrease of 44.4% was observed.

346. Profit margins, which had recovered in P2, P3, and P4, deteriorated sharply in P5, such that negative values were observed even in the gross margin during this period.

**8.2. Import behavior during the validity of the law**



347. Article 108 in conjunction with item III of Article 104 of Decree No. 8,058 of 2013 establishes that, for the purposes of determining whether injury to the domestic industry has continued or resumed due to imports.

The subject of the antidumping duty, the probable price of imports at the prices of

Dumping and its likely effect on the prices of similar products in the Brazilian domestic market.

348. Throughout the entire period analyzed, imports originating from the investigated countries

They did not prove to be representative. Even in P5, the period in which such imports reached their highest point.

at this level, the share of these imports in the total volume of the product in question imported by Brazil and

In the Brazilian market, it reached only 0.2%.

**8.3. From the comparison between the probable price of imports of the dumped product and the price of a similar product in the Brazilian domestic market**

349. Article 108 in conjunction with item III of Article 104 of Decree No. 8,058 of 2013 establishes that, for the purposes of determining whether injury to the domestic industry has continued or resumed due to imports.

The subject of the antidumping duty, the probable price of imports at the prices of

Dumping and its likely effect on the prices of similar products in the Brazilian domestic market.

350. To that end, it is first necessary to verify the effect of the imports subject to the duty.

antidumping duties on the domestic industry price during the review period. In accordance with the provisions of §

2. According to article 30 of Decree no. 8,058 of 2013, the effect of imports at dumping prices on prices

The domestic industry's performance should be evaluated from three perspectives. Initially, the existence of

significant undercutting of the price of the imported product at dumping prices in relation to the product

similar in Brazil, that is, if the internal price of the product under review is lower than the price of the product

Brazilian. Next, any potential price depression is examined, that is, whether the price of the imported product

This had the effect of significantly lowering the price in the domestic industry. The last aspect to be considered...

The issue being analyzed is price suppression. This occurs when imports subject to antidumping duties are reduced.

They significantly prevent price increases, due to increased costs, that would have occurred in

absence of such imports.

351. Given the lack of a representative volume of imports originating from Thailand and

From Chinese Taipei in P5, when compared to total imports and the Brazilian market, a was carried out

Comparison between the likely price of imports of the dumped product and the price of the product.

similar national product. Likewise, due to the insignificance of such imports in relative terms, it was not

It is possible to examine any potential price depression and suppression caused by these imports.

352. The probable price was determined based on data extracted from the Trade website.

Mappara the tariff code SH 401110 - **"Radial tyres, of a kind used on motor cars (including station wagons) and racing cars)**, since bias-ply tires are not included in the scope of the review. They were

Having identified the average FOB prices practiced by the investigated origins worldwide, for the ten ("Top") countries...

10") and for the five ("Top 5") main destinations of these exports, as well as the average prices of

Exports from these origins to South America. Furthermore, the prices of these are listed in the tables below.

Origins investigated for each of the South American countries and the "Top 5".

353. It is worth remembering, however, that the HS tariff code 401110 includes products outside the

The scope of antidumping duties generally corresponds to tires with larger and more expensive rims.

that the product that is the object of the right.

**Thailand's exports ( HS code 401110) - P5**

Target market	Quantity (kg)	Value (US\$)	Price (US\$/kg)	
Total (World)*		921.379.042	3,507,859	3.81
Top 10**		770,728,847	2,915,722	3.78
Top 5***		683,671,404	2,601,081	3.80
USA		522,774,597	1,880,609	3.60
South Korea		51,764,421	278,677	5.38
Japan		44,986,355	177,528	3.95
Malaysia		35,669,046	131,803	3.70
Australia		28,476,985	132,464	4.65
South America****	9,223,106		25,702	2.79



Chile	2,209,611	6,806	3.08
Colombia	2,104,798	5,470	2.60
Argentina	1,332,884	2,434	1.83
Ecuador	1,324,000	4.117	3.11
Peru	1,186,060	4,190	3.53
Bolivia	547,419	830	1.52
Paraguay	252,564	884	3.50
Venezuela	128,704	509	3.95
Guiana	77,140	123	1.59
Uruguay	59,926	339	5.66

Source: Trade Map.

Prepared by: DECOM.

\* Exclusive to Brazil

\*\*

Top 10: Top 5 + Saudi Arabia, Egypt, Vietnam, United Arab Emirates and China

\*\*\*

Top 5: USA, South Korea, Japan, Malaysia, and Australia

\*\*\*\* South America: Chile, Colombia, Argentina, Ecuador, Peru, Bolivia, Paraguay, Venezuela,

Guyana and Uruguay

Exports from Chinese Taipei (HS code 401110) - P5

Target market	Quantity (kg)	Value (Thousands of US\$)	Price (US\$/kg)
Total (World)*	77,890,321	321.029	4.12
Top 10**	59,317,924	247.006	4.16
Top 5***	50,427,211	208.289	4.13
USA	23,291,662	81,485	3.50
Australia	10,681,328	49,889	4.67
Japan	9,632,065	50.055	5.20
Germany	4,651,933	19.151	4.12
United Arab Emirates	2,170,223	7.709	3.55
South America****	2,240,561	8,773	3.92
Ecuador	932.216	3,764	4.04
Colombia	559,785	1,976	3.53
Peru	342,831	1.396	4.07
Chile	263.014	1.071	4.07
Venezuela	95,621	371	3.88
Argentina	36,572	154	4.21
Guiana	10.233	40	3.91
Uruguay	289	1	3.46

Source: Trade Map.

Prepared by: DECOM.

\* Exclusive to Brazil

\*\*

Top 10: Top 5 + Spain, United Kingdom, New Zealand, Netherlands and Saudi Arabia

\*\*\*

Top 5: USA, Australia, Japan, Germany, and the United Arab Emirates.

\*\*\*\* South America: Ecuador, Colombia, Peru, Chile, Venezuela, Argentina, Guyana, and Uruguay

354. It should be clarified that, in the case of Thailand, the export data from Trademap were reported in units. However, for 82 countries, there is "mirror" data **from** the same source with Quantities in kilograms. For these countries, the quantities present in the data were considered.





"Mirror". For other countries, an average unit conversion rate to kilograms was applied.

calculated based on the data in the two tables for these 82 countries. The conversion rate

The calculated average was 10.79 kilograms/unit.

355. Once the export prices determined from the **Trade Maps** data

For sales conditions FOB, international freight and insurance have been added to these prices;

Import tax (16% on the CIF price); AFRMM (8% on international freight); and expenses of

hospitalization, in order to be compared with the price of a similar national product.

356. Regarding hospitalization expenses, the percentage obtained from the was used.

Information provided by importers in the previous review, equivalent to [RESTRICTED]% of the CIF value.

357. The conversion of the domestic export price to reais was performed using the rate

average exchange rate for the continuation/resumption of dumping review period, obtained based on

official daily exchange rates published by the Central Bank of Brazil, pursuant to Article 23 of Decree

no8.058, of 2013.

358. The selling price of the domestic industry in the domestic market was obtained by the ratio between the

Net revenue and quantity sold, net of returns, in the domestic market in the last period of

revision.

Probable CIF Price (Internal) and Probable Undercut - **Exports from Thailand (HS 401110 ) -**

**P5** [RESTRICTED]

	World* Top 10 **		Top 5***	South America****
<b>FOB price (US\$/kg)</b>	<b>3.81</b>	3.78	3.80	2.79
International Freight and Insurance (US\$/kg)	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
CIF price ( US\$/ <b>kg</b> )	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Import Tax (US\$/kg)	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
AFRMM (US\$/kg)	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Hospitalization costs (US\$/kg)	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
CIF Price (US\$/kg)	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
<b>CIF Internal Price (R\$/kg) [A]</b>	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
<b>Domestic Industry Price (R\$/kg) [B]</b> [RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Likely Undercut (R\$/kg) (BA)	<b>6.33</b>	<b>6.48</b>	<b>6.35</b>	<b>12.43</b>

Source: Trade Map.

Prepared by: DECOM.

\* Exclusive to Brazil

\*\*Top 10: Top 5 + Saudi Arabia, Egypt, Vietnam, United Arab Emirates and China\*\*

Top 5: USA, South Korea, Japan, Malaysia, and Australia

South America: Chile, Colombia, Argentina, Ecuador, Peru, Bolivia, Paraguay, Venezuela

Guyana and Uruguay

Probable CIF Price (Internal Market) and Probable Undercut - **Exports from Chinese Taipei (HS 401110 )**

- **P5** [RESTRICTED]

	World* Top 10 **		Top 5***	South America****
<b>FOB price (US\$/kg)</b>	<b>4.12</b>	<b>4.16</b>	<b>4.13</b>	<b>3.92</b>
International Freight and Insurance (US\$/kg)	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
CIF price ( US\$/ <b>kg</b> )	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Import Tax (US\$/kg)	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
AFRMM (US\$/kg)	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Hospitalization costs (US\$/kg)	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
CIF Price (US\$/kg)	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
<b>CIF Internal Price (R\$/kg) [A]</b>	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
<b>Domestic Industry Price (R\$/kg) [B]</b> [RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]

Sub-price (R\$/kg) (BA)	4.46	4.21	4.41	5.69
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Source: Trade Map.

Prepared by: DECOM.

\*Exclusive to Brazil

\*\*Top 10: Top 5 + Spain, United Kingdom, New Zealand, Netherlands and Saudi Arabia\*\*

Top 5: USA, Australia, Japan, Germany, and the United Arab Emirates.

South America: Ecuador, Colombia, Peru, Chile, Venezuela, Argentina, Guyana, and Uruguay

359. From the analyses presented in the tables above, it can be deduced that, if Thailand and Chinese Taipei were to resume exporting automobile tires in significant volumes, their exports would likely enter Brazil at prices below those of the domestic industry. This indicates that, if the antidumping duties are not extended, exports from these origins would exert pressure on the price of similar products manufactured by the domestic industry. Again, it is important to emphasize that this result was obtained even considering that the tariff code data considered includes products outside the scope of the antidumping duty, which tend to be more expensive than the products within the scope (13 and 14 inch rims) of this review.

8.4. The likely impact of imports at dumping prices on the domestic industry.

360. Article 108 in conjunction with item IV of Article 104 of Decree No. 8,058 of 2013 establishes that, for the purposes of determining the likelihood of continued or resumed injury to the domestic industry resulting from imports subject to antidumping duties, the probable impact of such imports on the domestic industry must be examined, assessed based on all relevant economic factors and indices defined in paragraphs 2 and 3 of Article 30.

361. As previously demonstrated, throughout the entire period analyzed, the imports did not represent volumes of the product under review in relative terms, that is, when compared to total imports, the Brazilian market, and the volume of domestic sales of the domestic industry. The total volume imported from the investigated origins represented only 0.21% of the Brazilian market and corresponded to an amount equivalent to 1.1% of the domestic industry's domestic sales in P5, and in the other periods, these percentages were much lower. Thus, it can be concluded that the imports under review did not cause significant impacts on the behavior of the domestic industry's indicators throughout the review period.



362. By carrying out a prospective analysis, it is initially observed that, in the case of Thailand, considering the export potential of this origin and the probable magnitude of undercutting of its export price in relation to the price of the domestic industry, it can be concluded that, in the event of the termination of the duty, it is very likely that imports originating from that country will resume in volumes sufficient to cause damage to the domestic industry and, based on the analysis in item 5.2.1.4, it can also be seen that it is very likely that such imports will occur at dumping prices.

363. With regard to Chinese Taipei, in order to assess the likely impact on the domestic industry should the antidumping measure be lifted, it should be noted initially that this country has not exported to Brazil in significant volumes for more than 10 years.

364. The imported volumes in the periods analyzed in the last two reviews are presented in the table below.

Imports **Originating from Chinese Taipei**

[RESTRICTED]

in tons

	P1	P2	P3	P4	P5
Previous revision [RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]
Current revision [RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]	[RESTRICTED]

Source: Trade Map.

Prepared by: DECOM.

\*only [RESTRICTED] % of Brazilian imports

365. It is also noted that imports originating from Chinese Taipei, which were already negligible, simply ceased from P2 onwards in this review.

366. It is important to emphasize that the applicable duty rate for Chinese Taipei of US\$1.43/kg is equivalent to an ad valorem rate of approximately 44.2%, and cannot be considered prohibitive. Proof of this is the fact that Thailand exported [RESTRICTED] tons to Brazil in P5, even with an antidumping duty applied with ad valorem rates also exceeding 40%.

367. Regarding the magnitude of the law applied to Chinese Taipei, it should be noted that, on July 19, 2021, the US applied trade defense measures to imports of automobile tires originating from South Korea, Thailand, Chinese Taipei, and Vietnam, with the tariffs for Chinese Taipei presented below:

Country	Producer/Exporter	Antidumping Law
Chinese Taipei	Cheng Shin Rubber Ind. Co. Ltd	20.04% Nankang
	Rubber Tire Corp. Ltd.	101.84% Other Producers
		84.75%

**Source:International Trade Administration and Federal Register.**

Prepared by: DECOM.

368. It is observed that, with the exception of Cheng Shin Rubber Ind. Co. Ltd., the antidumping duty rates applied by the US to producers/exporters from Chinese Taipei are significantly higher than the rate in effect in Brazil. However, no redirection of exports from Chinese Taipei to Brazil has been observed since then.

369. It is also noted that, as mentioned in item 5.3 of this document, according to Trade Map data, total exports from Chinese Taipei amounted to 78,000 tons in P5. Comparing this volume with that recorded in P5 of the previous revision (approximately 163,000 tons), a significant decrease of 52% in the volume exported from this origin was observed.



370. Furthermore, it should be noted that, in P5 of the previous review, total exports from South Korea amounted to 539,000 tons, which is equivalent to an amount almost 7 times the volume of 78,000 tons exported by Chinese Taipei in P5 of the current review. Even with the antidumping duty suspended for South Korea, there was no resumption of the volume of the product in question exported from this origin, which led to the termination of the measure.

371. In light of all the above, despite the fact that it has been shown to be highly likely that, in the event of a resumption of imports originating from Chinese Taipei, the product would be imported at dumping and undervalued prices, there is sufficient evidence to raise doubts about the likely future evolution of imports originating from that country and about the occurrence of a significant impact of such imports on the indicators of the domestic industry.

8.5. Changes in market conditions

372. Article 108 in conjunction with item V of Article 104 of Decree No. 8,058 of 2013 establishes that, for the purposes of determining the continuation or resumption of injury to the domestic industry resulting from imports subject to antidumping duties, changes in market conditions in exporting countries, in Brazil or in third markets must be examined, including changes in the supply and demand of the like product, due, for example, to the imposition of trade defense measures by other countries.

373. DECOM highlights that, after the conclusion of the first end-of-period review, the US applied trade defense measures to imports from South Korea, Thailand, and Chinese Taipei.

8.6. Regarding statements about the resumption of damages

374. On September 22, 2025, Anip submitted its final statement, initially asserting that DECOM understood that there were sufficient elements to raise doubts regarding the likely future evolution of imports originating from Chinese Taipei, given the low volume of exports.

to Brazil throughout the review period. He emphasized that the analysis of the likely resumption of dumping is, by nature, prospective, and that this means the investigating authority must base its decision on positive evidence and focus on what may occur in the future, not just what has already happened.

375. It further emphasized that analysis based on positive evidence does not require absolute certainty about what is likely to occur in the future and that the Anti-Dumping Agreement does not establish any specific methodology for "probability" analysis.

376. Anip emphasized that, as presented in the case files, Chinese Taipei has a strong tire industry, has shown constant growth in recent years, has high installed capacity, and allocates a significant portion of its production to the external market. It highlighted that the reduction in exports to Brazil does not mean that the country of origin cannot resume the practice of dumping and that this fact demonstrates the effectiveness of trade defense measures.

377. He further stated that the undercutting calculations and arguments regarding the export potential of Chinese Taipei demonstrate that the decrease in exports from this origin to Brazil does not indicate the cessation of unfair trade practices.

378. Regarding underpricing, Anip pointed out that the extensive case law of DECOM recommends extending the right when underpricing is demonstrated, even when imports from the investigated origins have ceased.

**8.6.1. Regarding DECOM's positioning**

379. It should be noted initially that doubts regarding the likely future evolution of imports originating from Chinese Taipei are not solely due to the low volume of exports from that origin to Brazil, but to all the elements listed in item 8.4. These elements allowed DECOM to assess, based on prospective analysis, the probability of a resumption of imports originating from Chinese Taipei in volumes sufficient to cause harm to the domestic industry. As correctly pointed out by the petitioner, the Anti-Dumping Agreement does not establish any specific methodology for probability analysis.

380. Finally, it should be noted that, based primarily on undercutting calculations and arguments regarding the export potential of Chinese Taipei, DECOM believes that the measure for this origin should be extended. It is important to remember that the antidumping duty needs to be extended for its application to be suspended.

**8.7. Conclusion regarding the likelihood of recurrence of the damage**

381. In view of all the foregoing, for the purposes of final determination, it can be concluded that it is highly likely that the injury to the domestic industry will resume due to imports from Thailand at dumping prices.

382. With regard to Chinese Taipei, although there are elements that suggest a resumption of injury is likely, there are also sufficient elements to raise doubts about the probable future evolution of imports originating from Chinese Taipei, should the antidumping duty not be extended.

**9. OF OTHER MANIFESTATIONS**

383. On July 9, 2025, Anip submitted a statement arguing that, given the lack of cooperation from the interested parties, no elements capable of modifying the conclusions of the investigating authority contained in SECER Circular No. 3/2025 were presented in the case file, so the extension of the antidumping duty in force should be determined, in the amounts calculated for "other producers/exporters" at the time of the last review, since, in this case, the best available information should be applied, pursuant to § 3, of art. 50 of Decree No. 8,058/2013.

**9.1. Regarding DECOM's positioning**

384. DECOM emphasizes that the non-participation of other interested parties does not preclude the investigating authority from reviewing and reassessing its understanding based on the elements contained in the case file, in pursuit of the material truth, which imposes on the administration the duty to analyze the available body of evidence.





10. CALCULATION OF THE FINAL ANTIDUMPING DUE

385. According to §4 of article 107 of the Brazilian Regulation, if there have been no exports from the country to which the antidumping measure applies, or if there have only been exports in non-representative quantities during the review period, as in the present case, an extension of the antidumping duty will be recommended in an amount equal to or less than the duty in force.

386. Regarding the amounts of duties to be proposed for the investigated origins, the lack of cooperation from the producers/exporters of these origins is reiterated. Therefore, primary price data, which would be extremely relevant for any eventual updating of the amounts of the measures, is not included in the case file. Furthermore, this is a product for end use, characterized by a multiplicity of types, which increases the limitations inherent in secondary data.

387. Furthermore, as presented in item 7.2 above, it was observed that the deterioration of the domestic industry indicators could not be attributed to imports of the product subject to the antidumping duties in question.

388. Therefore, pursuant to paragraph 4 of article 107 of Decree No. 8,058 of 2013, it is recommended that Maintaining the amounts of the measures currently in place for Thailand and Chinese Taipei.

11. RECOMMENDATION

389. In accordance with the preceding analysis, the likelihood of a resumption of dumping practices in exports to Brazil of new radial rubber tires for passenger cars, series 65 and 70, rims 13" and 14", and treads 165, 175 and 185, originating from Thailand and Chinese Taipei, commonly classified under subheading 4011.10.00 of the Mercosur Common Nomenclature - NCM, was proven, as well as the likelihood of a resumption of injury to the domestic industry resulting from such practices, should the antidumping duties not be renewed.

390. Pursuant to paragraph 4 of article 107 of the Brazilian Regulation, in the event of a positive determination to resume dumping, if there have been no exports from the country to which the antidumping measure applies, or if there have only been exports in non-representative quantities during the review period, an extension of the antidumping duty will be recommended in an amount equal to or less than the duty in force.

391. In this regard, it is recommended that the definitive antidumping duty applied to Brazilian imports of new radial rubber tires for passenger cars, series 65 and 70, rims 13" and 14", and treads 165, 175 and 185, originating from Thailand and Chinese Taipei, be extended without alteration, in the amounts specified below:

Definitive Antidumping Law

Origin	Producer / Exporter	Definitive Antidumping Law (US\$/kg)
Thailand	Sumitomo Rubber (Thailand) Co. Ltd. 1.32	
Thailand	Svizz-One Corporation Ltd.	1.35
Thailand	Other producers/exporters 1.35 Chinese Taipei	
All producers/exporters 1.43*		

Prepared by: DECOM.

\*Extension with immediate suspension, pursuant to article 109 of Decree no. 8,058 of 2013.

392. Given the existence of doubts regarding the likely future evolution of imports of the product subject to antidumping duties originating from Chinese Taipei, pursuant to Article 109 of the Brazilian Regulation, DECOM recommends the immediate suspension of the application of the antidumping duty to that origin after its extension.

393. The collection of the duty shall be immediately resumed if the increase in imports occurs in a volume that could lead to a recurrence of the injury, as provided for in the sole paragraph of Article 109 of Decree No. 8,058 of 2013, after an analysis concluding that the increase in imports is in a volume that could lead to a recurrence of the injury, pursuant to Article 257 of Ordinance No. 171 of 2022. The analysis will be carried out upon presentation of a petition filed by the interested party containing



Data on the evolution of Brazilian imports of tires originating from Chinese Taipei in the periods subsequent to the suspension of the duty, pursuant to paragraph 1 of the aforementioned article. If submitted, the petition with supporting evidence must contain import data relating to the entire period elapsed since the date of publication of the extension of the duty, covering at least a period of six months, in order to constitute a reasonable period for the analysis of its behavior. For the same purpose, subsequent petitions may be accepted after a minimum period of six months has elapsed between each petition submitted, in accordance with current legislation.

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