



**Australian Government**  
**Anti-Dumping Commission**

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**CUSTOMS ACT 1901 - PART XVB**

**CONSIDERATION REPORT  
NO. 225**

**APPLICATION FOR A DUMPING DUTY NOTICE**

**WHITE UNCOATED A4 AND A3 CUT SHEET PAPER  
EXPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA**

**OCTOBER 2013**

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### 2 ABBREVIATIONS & SHORTENED FORMS

ABBREVIATION / SHORT FORM	FULL REFERENCE
ABS	the Australian Bureau of Statistics
ACBPS	the Australian Customs and Border Protection Service
the Act	<i>Customs Act 1901</i>
ADRP	Anti-Dumping Review Panel
AD Agreement	World Trade Organisation Agreement on Anti-Dumping
the applicant	Paper Australia Pty. Ltd.
Australian Paper	Paper Australia Pty. Ltd. (the applicant)
The Commission	Anti-Dumping Commission
Commissioner	The Commissioner of the Anti-Dumping Commission
CTMS	Cost to make and sell
the delegate	the delegate of the Commissioner
the Division	Division 2 of Part XVB of the Customs Act 1901
FOB	free-on-board
the goods	the goods the subject of the application (white uncoated A4 and A3 cut sheet paper from China)
The Minister	the Minister for Industry
NIP	non-injurious price
SEF	statement of essential facts
SG&A	selling, general and administrative
USP	unsuppressed selling price
WTO	World Trade Organisation

### 3 SUMMARY AND RECOMMENDATIONS

#### 3.1 Background

This Consideration Report (CON 225) details the results of the Anti-Dumping Commission's (the Commission's) consideration of an application lodged by Paper Australia Pty Ltd (known as 'Australian Paper' and hereafter referred to as such) for the publication of a dumping duty notice on white uncoated A4 and A3 cut sheet paper (copy paper) exported to Australia from the People's Republic of China (China).

#### 3.2 Recommendations

The Commission recommends that the delegate of the Anti-Dumping Commissioner (the Commissioner)<sup>1</sup> decide not to reject the application.

If the Commissioner accepts this recommendation, to give effect to that decision, the Commissioner must publish the notice at **Appendix 1** indicating that the Commission will inquire into whether the grounds exist to publish a dumping duty notice in respect of copy paper exported from China.

#### 3.3 Application of law to facts

Division 2 of Part XVB (the Division) of the Customs Act 1901 (the Act)<sup>2</sup> sets out procedures for considering an application for a dumping duty notice.

#### 3.4 The role of the Anti-Dumping Commission

The Commission is responsible for preparing a report for the Commissioner examining an application for a dumping duty notice.

In this report, the following matters are to be considered in relation to the application:

- whether the application complies with subsection<sup>3</sup> 269TB(4) of the Act;
- whether there is, or is likely to be established, an Australian industry in respect of like goods; and
- whether there appear to be reasonable grounds for the publication of a dumping duty notice in respect of the goods the subject of the application.

#### 3.5 The role of the Anti-Dumping Commissioner

The Division empowers the Commissioner, after having regard to the Commission's report and to any other information that the Commissioner considers relevant, to reject or not reject an application for the publication of a dumping duty notice.

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<sup>1</sup> References to the Commissioner in this report also refer to the Delegate of the Commissioner.

<sup>2</sup> All references in this report to sections of legislation, unless otherwise specified, are to the *Customs Act 1901*.

<sup>3</sup> The terms "section", "s." and "subsection" are used interchangeably in this report.

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If the Commissioner decides not to reject the application, the Commissioner must give public notice of the decision providing details of the investigation.

The Commissioner's powers have been delegated to certain officers of the Commission.

### **3.6 Findings and conclusions**

The Commission has examined the application and is satisfied that:

- the application complies with the requirements of s. 269TB(4) of the Act (as set out in Section 5 of this report);
- there is an Australian industry in respect of like goods (as set out in Section 6 of this report); and
- there appear to be reasonable grounds for the publication of a dumping duty notice in respect of the goods the subject of the application (as set out in Sections 7, 8 and 9 of this report).

## 4 BACKGROUND

### 4.1 Application

On 17 September 2013, an application was lodged by Australian Paper requesting that the relevant Minister publish a dumping duty notice in relation to copy paper exported to Australia from China.

In this application, Australian Paper alleges that the Australian industry has suffered material injury caused by copy paper exported to Australia from China at dumped prices.

Australian Paper claims that, although imports of copy paper from China have been present (and their export prices steadily declining) since 2009, in 2011 the volume of these imports began to rapidly escalate and injury to Australia Paper has occurred as a result (estimated to have begun in mid-2011).

The application identified the injurious effects from dumping as including:

- loss of sales volumes;
- loss of market share;
- price depression;
- reduced revenue;
- reduced return on investment; and
- reduced employment.

### 4.2 The goods the subject of the application

#### 4.2.1 Description

The goods the subject of the application are:

*Uncoated white paper of a type used for writing, printing or other graphic purposes, in the nominal basis weight range of 70 to 100 gsm and cut to sheets of metric sizes A4 (210mm x 297mm) and A3 (297mm x 420mm) (also commonly referred to as cut sheet paper, copy paper, office paper or laser paper).*

*The paper is not coated, watermarked or embossed and is subjectively white. It is made mainly from bleached chemical pulp and/or from pulp obtained by a mechanical or chemi-mechanical process and/or from recycled pulp.*

#### 4.2.2 Product standards

The application submits that the ANZSIC code applicable to copy paper is C1510 Pulp, Paper and Paperboard Manufacturing.

#### 4.2.3 Tariff classifications

The application states that copy paper is classified to:

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- tariff subheading 4802.56.10, statistical codes 03 and 09; and
- tariff subheading 4802.56.90, statistical code 19.

The application observes that tariff subheading 4802.56.10 refers to A4 copy paper, while 4802.56.90 relates to A3 copy paper.

The Australian Customs and Border Protection Service (ACBPS) has provided tariff advice that in order for the goods to be correctly classified to the above tariff subheadings, they also must comply with the requirements of Note 5 of tariff Chapter 48 (which relates to paper and paperboard; articles of paper pulp, of paper or of paperboard).

The Australian industry is aware of this advice, and has advised that the goods that are the subject of its application should be effectively targeted by the nominated tariff classifications.

The general rate of duty applicable to the nominated classifications is currently 5 per cent for goods imported from China.

### **4.3 Previous investigations**

#### **4.3.1 Exports from China**

In July 2003, Australian Paper lodged an application in relation to the alleged dumping of A4 copy paper exported to Australia from China. Customs terminated the investigation against China as there was no evidence of dumping found at the time.

#### **4.3.2 Exports from other countries**

In May 1993, Associated Pulp and Paper Mills lodged an application in respect of exports of certain A4 copy paper from Austria, Brazil, Finland, France, Germany, Indonesia, South Africa and the United States of America (USA). Following the investigation and review by the Anti-Dumping Authority (ADA) in February 1994, the then Minister for Customs accepted the recommendations contained in ADA Report No. 119 and a dumping duty notice was published in respect of copy paper exported to Australia from Brazil, Finland, Germany, Indonesia, South Africa and the USA (including price undertakings).

A number of reviews, continuation enquiries and Federal Court proceedings ensued in the years following that affected either individual exporters or countries of export. There are currently no anti-dumping measures on exports of A4 copy paper exported to Australia from any country, with the final measures on exports from Finland expiring on 20 February 2004.

### **4.4 Current measures**

There are currently no anti-dumping measures on the goods exported to Australia.

### **4.5 Consideration of the application**

Under subsection 269TC(1) of the Act, the Commissioner must examine the application and within 20 days of lodgement decide whether or not to reject the application. This decision must be made no later than 8 October 2013.

Subsection 269TC(1) of the Act specifies that the Commissioner shall reject an application if the Commissioner is not satisfied that:

- the application complies with subsection 269TB(4); or
- there is, or is likely to be established, an Australian industry in respect of like goods; or
- there appear to be reasonable grounds for the publication of a dumping duty notice and/or a countervailing duty notice in respect of the goods the subject of the application.

The above matters are examined in the following sections of this report.

## **5 COMPLIANCE WITH SUBSECTION 269TB(4)**

### **5.1 Finding**

Based on the information provided in the application, the Commission is satisfied that the application complies with s.269TB(4) of the Act.

### **5.2 Legislative framework**

Subsection 269TB(4) requires that the application must be in writing, be in an approved form, contain such information as the form requires, be signed in the manner indicated by the form and be supported by a sufficient part of the Australian industry.

### **5.3 The Commission's assessment**

#### **5.3.1 Approved form**

The application is in writing, in the approved form, contains such information as the form requires (as discussed in the following sections of this report) and is signed in the manner indicated in the form.

Australian Paper submitted confidential and public record versions of the application along with numerous appendices and attachments. The Commission considers that the public record version of the application contains sufficient detail to allow a reasonable understanding of the substance of the information.

#### **5.3.2 Supported by Australian industry**

An application is taken to be supported by a sufficient part of the Australian industry if the persons who produce or manufacture like goods in Australia and who support the application:

- account for more than 50% of the total production or manufacture of like goods by that proportion of the Australian industry that has expressed either support for or opposition to, the application; and
- account for not less than 25% of the total production or manufacture of like goods in Australia.

The application states that Australian Paper is the only Australian producer of copy paper. The application advises that, historically, Tas Paper Pty Ltd also manufactured copy paper in Australia, but that its mills closed in mid-2010.

Based on the evidence provided, the Commission considers the application is supported by a sufficient part of the Australian industry (namely the entire industry).

## 6 LIKE GOODS AND THE AUSTRALIAN MARKET

### 6.1 Finding

Based on the information provided in the application, the Commission is satisfied that there is an Australian industry producing like goods to the goods the subject of the application and that the data provided in the application is sufficient for the purpose of analysing the economic condition of the Australian industry for copy paper.

### 6.2 Legislative framework

Subsection 269TC(1) of the Act requires that the Commissioner must reject an application for a dumping duty notice if, inter alia, the Commissioner is not satisfied that there is, or is likely to be established, an Australian industry in respect of like goods.

In making this assessment, the Commissioner must first determine that the goods produced by the Australian industry are “like” to the imported goods.

Subsection 269T(1) defines like goods as:

*Goods that are identical in all respects to the goods under consideration or that, although not alike in all respects to the goods under consideration, have characteristics closely resembling those of the goods under consideration.*

This issue is examined in Section 6.3.1 below.

The Commissioner must also be satisfied that the “like” goods are in fact produced in Australia. Subsections 269T(2) and 269T(3) of the Act specify that for goods to be regarded as being produced in Australia, they must be wholly or partly manufactured in Australia.

In order for the goods to be considered as partly manufactured in Australia, at least one substantial process in the manufacture of the goods must be carried out in Australia. This issue is examined in Section 6.3.2 below.

### 6.3 Locally produced like goods

#### 6.3.1 Like goods

##### Australian Paper’s claims

Australian Paper stated that it produces copy paper that is like to the goods in that they are identical to, or very closely resemble the imported copy paper.

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The basis for this claim is that:

- both products are very similar in physical appearance and characteristics (namely 'physically alike in all practical aspects');
- the products compete directly in the same markets;
- the products are directly substitutable;
- the products have similar production processes;
- the products compete directly in the same markets; and
- both products have the same end-uses.

Australian Paper submitted the following:

### *(a) Physical likeness*

Both the imported goods and the goods produced by the Australian industry are white paper cut in rectangular sheets and generally wrapped in reams of 500 sheets, but also sold in packs containing different numbers of sheets. Both are what the Australian consumer would recognise as white copy paper. Unless placed side by side, the average consumer would be unlikely to notice any difference between the products.

In the Australian market, the predominant sheet size and basis weight is A4, 80 gsm but with some A3 and a very small quantity of US sizes. The old imperial sheet sizes have fallen out of use. As well as the 80gsm weight which dominates the Australian market, some 70gsm, 75 gsm, 90 gsm and 100gsm is used together with small amounts of heavier weights used for special purposes.

The imported goods and the goods produced by the Australian industry are physically alike in all practical aspects.

### *(b) Commercial Likeness*

The imported goods and the goods produced by the Australian industry compete for the same market. In particular, a significant portion of the Australian market is goods wrapped and sold as the purchaser's own brand e.g. Fuji Xerox. In this portion of the market, together with the 'plain wrap' and generic products, there is direct head-to-head competition between imported goods and the goods produced by the Australian industry. At different times in the past, Australian Paper has provided several of the purchaser's brand products now sourced from China, [REDACTED]  
[REDACTED]

Where the goods are wrapped and sold in the manufacturer's brand and are heavily promoted, e.g. Australian Paper's 'REFLEX®' brand, there is some short term decoupling of price, but ultimately the end consumer will switch based on the trade-off between price, service and reputation.

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### *(c) Functional Likeness*

Both the imported goods and the goods produced by the Australian industry are used in the same range of applications, including high speed and low speed copying, printing (both on computer printers and small offset printers), and general use in business, education and home offices as well as in small offset printers.

The imported goods and the goods produced by the Australian industry are functionally alike in all practical aspects.

In the Chinese domestic market, as well as 'export grade' goods which are generally comparable with the goods sold in the Australian domestic market, there are also lower priced goods which have significantly inferior appearance (e.g. lower brightness, lower whiteness, poor surface finish, specks, inconsistency etc.) and, at times, functionality (e.g. unsuited to high speed duplex copying or printing) when compared with the 'export grade' goods.

### *(d) Production Likeness*

The paper production and finishing processes are substantially identical across the large scale industry. Some mills, such as UPM-Kymmene China, use paper pulp purchased from bleached pulp mills located elsewhere while others, such as Australian Paper, have their own bleached pulp mills on site.

The imported goods and the goods produced by the Australian industry are manufactured using equipment and processes which are alike in all significant practical aspects and which are as described in 6.3.2 below.

### The Commission's assessment

The Commission has examined the evidence presented in the application and is satisfied that, based on the information provided in the application, the applicant has demonstrated that:

- the primary physical characteristics of imported and locally produced goods are similar;
- the imported and locally produced goods are commercially alike as they are compete in the same markets;
- the imported and locally produced goods are functionally alike as they have a similar range of end-uses; and
- the imported and locally produced goods are manufactured in a similar manner.

The Commission is therefore satisfied, for the purposes of this report, that the Australian industry produces like goods to the goods the subject of the application, as defined in s. 269T(1) of the Act.

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### 6.3.2 Manufacture in Australia

Subsections 269T(2) and 269T(3) of the Act specify that for goods to be regarded as being produced in Australia, they must be wholly or partly manufactured in Australia.

In order for the goods to be considered as partly manufactured in Australia, at least one substantial process in the manufacture of the goods must be carried out in Australia.

#### Manufacturing process

Australian Paper submits that it undertakes more than one substantial process of manufacture in the production of the goods.

Australian Paper's manufacturing process is described in the application, and is summarised below.

- Wood pulp (either made on site or purchased (imported)) is blended with filler, starch, sizing agents, dyes and minor chemicals which are then, in very dilute form (less than 1% solids), pumped to a 'headbox'.
- The headbox's horizontal nozzle forms the paper sheet on a horizontal rapidly moving mesh belt or 'wire' from which some of the water is drained by gravity and by suction. At the end of the wire, the paper sheet is still only around 20% solids (80% water).
- The sheet then passes through a series of press rolls and more water is removed by pressure, leaving the sheet about 40% solids (60% water).
- The remainder of the water is removed by evaporation as the sheet passes around a series of steam heated drying cylinders.
- The sheet then has a layer of starch applied to each surface at the 'size press' and is again dried using steam heated cylinders and calendared between smooth rolls at high pressures to give a smooth surface.
- The sheet is then rolled into parent rolls or 'Jumbos' several metres long and over 2 meters in diameter, weighing several tonnes.
- The Jumbos are then rewound into smaller reels, generally 1.5 metres in diameter and around 2.5 metres long for use in the sheeting process.
- These smaller reels are cut directly into A4, A3 or other cut sheet sizes, usually but not always wrapped as reams (generally, but not exclusively of 500 sheets), packed into boxes and the boxes palletised on highly automated 'finishing' equipment (the 'Cut Size Lines'). At this point the cut sheet paper is ready for loading for shipment.

#### The Commission's assessment

Based on the description provided by Australian Paper of its manufacturing processes for copy paper, the Commission is satisfied that there is at least one substantial process of manufacture performed in Australia and, therefore, that the goods may be taken to have been produced in Australia.

## 6.4 Australian market

### 6.4.1 General

Australian Paper submits that the Australian copy paper market consists predominantly of A4 size, 80 gsm paper, with a smaller quantity of A3 copy paper and a 'miniscule' amount of A5 product. In addition to 80 gsm paper, small quantities of 70, 75, 90 and 100 gsm paper are also sold in Australia.

### 6.4.2 End use

Australian Paper submitted (as part of the description of the goods and its own like goods) that the end uses for copy paper are 'writing, printing or other graphic purposes'.

Australian Paper further submitted that:

The product, both locally produced and imported, is described variously as white 'cut sheet', 'cut ream', 'cut size', 'office paper', 'copy paper' or 'laser paper' is used in both dry toner and ink jet copying, faxing and printing in offices and in instant printing outlets. It is also used in smaller quantities for offset printing and for general printing, business, educational and home office uses.

### 6.4.3 Market segmentation and demand variability

Australian Paper submits that the Australian copy paper market is segmented as follows:

- home and home office/small office (served predominantly by retailers);
- medium and large businesses, government and education (served predominantly by contract resellers); and
- industrial users including instant print and in-plant printing operations (served predominantly by wholesale paper merchants).

The applicant noted that there are three 'categories' of product in the Australian market:

- manufacturers' brands (e.g. REFLEX<sup>®</sup>, PaperOne);
- private label products (i.e. copy paper that is wrapped for customers in their own brands e.g. Fuji Xerox, Officemax); and
- plain label copy papers or generic products.

Australian Paper submits in its application that:

Dumping occurs in all end use sectors and channels of the Australian market and is supported by the common practice of retailers to use office paper as a low priced item to draw in buyers and for businesses to issue tenders for

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stationery supply where the lowest office paper price has a large influence on the outcome.

Australian Paper claims that there is no significant demand variability in the Australian copy paper market, with demand remaining constant throughout the year and the size of the market being generally relative to the number of Australians in full time office-based employment.

Australian Paper submits that Australian copy paper market is a 'high volume commodity market' and that there is 'little readily discernable differentiation (in the market) other than price'.

### **6.4.4 Marketing and distribution**

The applicant submits that 'brand recognition' in the Australian copy paper market primarily relates to Australian Paper's REFLEX<sup>®</sup> brand, which is the subject of significant promotion.

Australian Paper submits that copy paper in Australia is sold to market predominantly through national resellers and retailers (including Officemax, Staples, Fuji Xerox, Wesfarmers, Woolworths and Australia Post).

The application indicated that these resellers and retailers have direct supply contracts with manufacturers of copy paper.

### **6.4.5 Alternative products**

Australian Paper stated that there are no commercially significant substitutable products with respect to copy paper available in the Australian market.

The application highlights that, on occasion, mechanical, tinted, embossed, watermarked, pre-printed and coated papers may be used as an alternative to copy paper, but that these are significantly higher priced than copy paper and are rarely used as a replacement unless there is a specific requirement.

### **6.4.6 Market size**

Australian Paper claims that the Australian copy paper market is 'mature', with overall annual volumes remaining stable (with growth in population offsetting declines in per capita use of copy paper).

In its application, Australian Paper used import data sourced from the Australian Bureau of Statistics (ABS) and its own sales data to estimate the size of the Australian market for copy paper for each calendar year during the period 2010-2012 inclusive, and for the first six months of calendar year 2013.

The Commission compared the estimated import volumes in the application to the data in the ACBPS import database. The import data showed that total imports of copy paper under the relevant classifications were similar to those estimated by Australian Paper. Consequently, the Commission considers that the data in ACBPS's

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import database and the application provide a reasonable estimate of import volumes.

The following graph depicts the Commission's estimate of the Australian market size for copy paper using data from the ACBPS import database and Australian Paper's sales data.

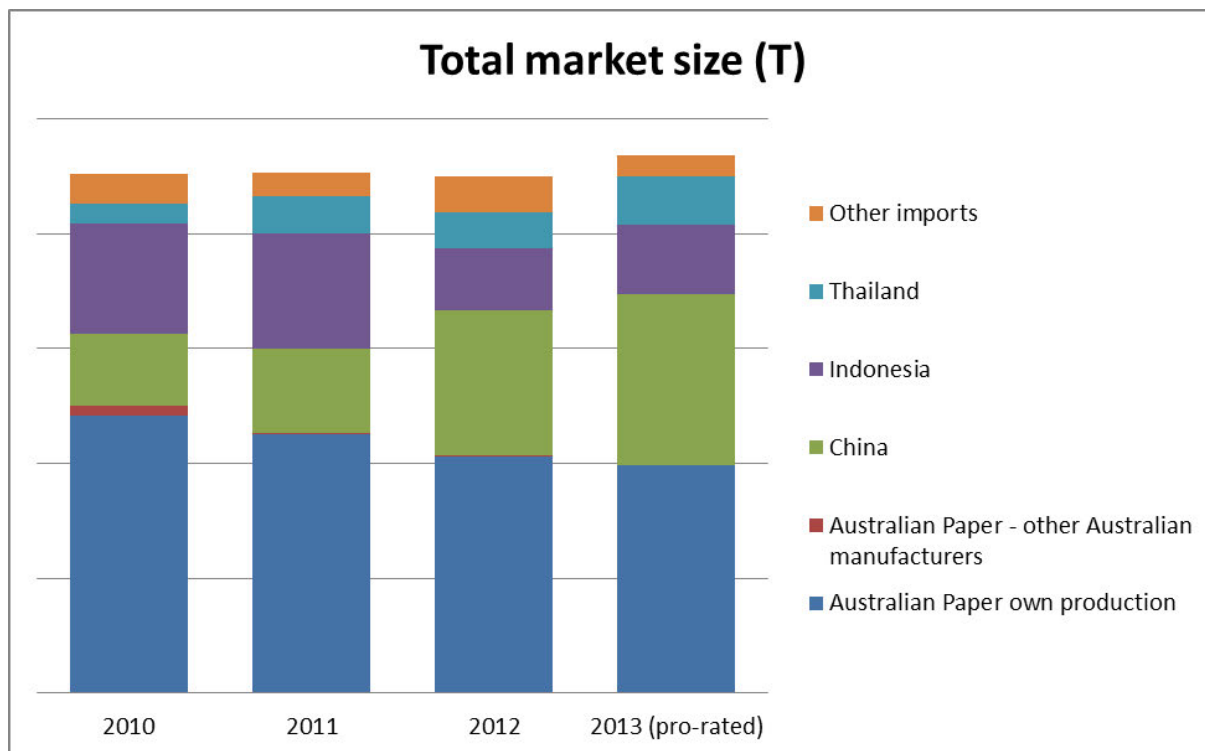


Figure 1: Australian market for copy paper: 2010-2013 (pro-rated)

For the purposes of the above chart, available data for calendar year 2013 (submitted by the Australian industry up to the end of June 2013) has been pro-rated. Noting that Australian Paper submits that there is little seasonal variability in the Australian copy paper market, this is considered reasonable.

The Commission estimates that in calendar year 2012 the size of the Australian market for copy paper was approximately 225,000 tonnes. For calendar year 2013 (pro-rated), this estimate stands at approximately 230,000 tonnes.

Figure 1 shows that the total Australian market size for copy paper has remained relatively stable since 2010.

Further, the table above reflects that, notwithstanding the stability in the overall size of the Australian market, import volumes from China have increased over the period year-on-year, with a significant increase in 2012 and a further (less pronounced) increase in 2013 (pro-rated).

Data supporting the Commission's estimate of the Australian market size for copy paper is at **Confidential Appendix 2**.

### **6.5 Australian industry information**

#### **6.5.1 General accounting / administration information**

Australian Paper is a wholly owned subsidiary of Nippon Paper Industries Co. Ltd.

Australian Paper advises that its 'Australian Office' is the business name of the division of the company which sells the goods in Australia and in New Zealand, while exports of the goods (other than to New Zealand) are generally undertaken by 'Paper Products Marketing' (PPM), a collection of 5 subsidiary companies of Australian Paper.

Australian Paper's financial accounting period is from 1 January to 31 December. The company changed from a July-June financial Year to a January-December (calendar year) financial year in July 2009.

Australian Paper provided copies of its audited financial statements for the following periods:

- July - December 2009; and
- Financial year (calendar) 2010, 2011 and 2012.

Australian Paper also provided copies of its unaudited balance sheet and profit and loss statement for the period January – June 2013 (first half of the company's 2013 financial year).

In addition, Australian Paper provided its chart of accounts, internal management accounting reports for January 2001 – June 2013, and general accounting and administration information.

#### **6.5.2 Australian industry's sales**

Australian Paper provided information in the application, including a summary of domestic and export sales volumes, revenues, discounts and rebates as required in Confidential Appendices A2, A3, A4, A5 and A6. Confidential Appendix A1 was also provided to substantiate production volumes for Australian Paper for the period 1 January 2011 to 31 December 2012. The Commission notes that Appendix A1 appears to report sales volumes rather than production volumes, however production volumes are disclosed in Appendix A6.

The Commission examined the detail in, and link between, relevant appendices and observed that they reconciled (with some immaterial variances). The total sales revenue for Australian Paper provided in the appendices was able to be reconciled to the company's audited financial statements for 2010 to 2012, and to the unaudited profit and loss statement provided for the first half of the company's financial year 2013. Consequently, the Commission considers that Australian Paper's appendices are reliable for preliminarily assessing the economic condition of the industry in respect of copy paper.

### **6.5.3 Cost information**

Australian Paper completed a Confidential Appendix A6 cost to make and sell (CTMS) spreadsheet for domestic and export sales. The information provided in this appendix included production and sales volumes, manufacturing costs, and selling, general and administrative (SG&A) expenses for Australian paper's 2011 and 2012 financial years, and January – June 2013 (first half of the 2013 financial year).

The Commission examined the information provided and the link between other appendices and considers the information reliable for the purposes of preliminarily assessing the economic condition of the industry in respect of copy paper.

### **6.5.4 Other economic factors**

Australian Paper completed Confidential Appendix A7 showing movements in assets, capital investment, revenue, capacity, capacity utilisation, closing stocks and cash flow measures.

### **6.5.5 The Commission's assessment – Australian industry**

Based on the information in the application, the Commission is satisfied that there is an Australian industry producing like goods to the goods the subject of the application and that the information contained in the application is sufficient for the purposes of a preliminary analysis of the economic condition of the industry in respect of copy paper from 2010 to June 2013 (noting that CTMS information has only been provided from 2011 onwards).

## **7 REASONABLE GROUNDS – DUMPING**

### **7.1 Findings**

Having regard to the matters contained in the application and to other information considered relevant, there appear to be reasonable grounds to support the claims that:

- copy paper has been exported to Australia from China at dumped prices;
- the volume of copy paper that appears to have been dumped from China is greater than 3% of the total Australian import volume of the goods, and therefore is not negligible; and
- the estimated dumping margin is greater than 2% and is therefore not negligible.

### **7.2 Legislative framework**

Article 5.2 of the World Trade Organisation (WTO) Anti-Dumping Agreement (AD Agreement) states that an application shall include evidence of dumping. It states that simple assertion, unsubstantiated by relevant evidence, cannot be considered sufficient to meet this requirement, but such information must be reasonably available to the applicant.

Subsection 269TC(1) of the Act requires that the Commissioner must reject an application for a dumping duty notice if, inter alia, the Commissioner is not satisfied that there appear to be reasonable grounds for the publication of a dumping duty notice.

Under section 269TG of the Act, one of the matters that the Minister must be satisfied of to publish a dumping duty notice is that the export price of goods that have been exported to Australia is less than the normal value of those goods. This issue is considered in the following sections.

### **7.3 Export prices**

#### **7.3.1 Australian Paper's claims**

Australian Paper used ABS import data, which is available by country for the relevant tariff classifications, to estimate the weighted average export price of copy paper from China using the import quantity in kilograms and the FOB value of imports.

The average Chinese export price for copy paper estimated by Australian Paper for 2012-13 was calculated by dividing the total Customs value by the export volume.

#### **7.3.2 The Commission's assessment**

The Commission compared the export price calculation provided by Australian Paper with data contained in ACBPS's import database. Prior to making the comparison, the Commission cleansed the ACBPS import data to ensure as far as possible that only those goods that clearly fall within the goods description are included in the

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export price calculation. The Commission found that the volume and value in the import database were within 1% of the volume and value estimated by Australian Paper for 2012-13.

The Commission considers that, based on the information submitted in the application, the amounts used by Australian Paper to estimate FOB export prices for copy paper exported from China to Australia appear to be reasonable.

A comparison of Australian Paper's and ACBPS's import volumes and unit price is at **Confidential Appendix 3**.

### **7.4 Normal values – domestic selling prices**

#### **7.4.1 Australian Paper's claims**

Australian Paper claims that A4 80gsm copy paper is by far the largest volume of copy paper exported to Australia. For this reason it has calculated a dumping margin for A4 copy paper only for the purpose of supporting its assertions in relation to dumping.

Australian Paper commissioned a consultant to prepare a report on domestic selling prices for copy paper in China. It provided an extract of that report with its application that showed monthly prices for seven types of A4 80gsm copy paper. It removed the 17% VAT included in the prices and converted the Chinese currency to Australian dollars (for comparison with its export price) using the monthly exchange rate obtained from the Reserve Bank of Australia.

#### **7.4.2 The Commission's assessment**

Based on examination of the import database and Australian Paper's own sales information in Appendix A4, the Commission considers it reasonable to substantiate Australian Paper's assertions in relation to dumping by reference to a calculation of a dumping margin for one particular model that has the largest export volume to Australia. The Commission will ultimately be required to determine a weighted average product dumping margin, ie a dumping margin for the goods as a whole, but given the relative weighting of the model chosen by Australian Paper for its calculations and the size of the resulting dumping margin the Commission considers that one model to be indicative of whether dumping at the product level is occurring.

Australian Paper advised in its application that the identity of the consultant that prepared the price information is confidential. The extract of the report provided with the application provides no indication of how the domestic selling prices were obtained. The Commission considers the information provided to support Australian Paper's claims of actual domestic selling prices in China is inadequate, as no information was provided regarding how domestic selling prices were obtained, and has placed limited reliance on it.

### **7.5 Normal values – constructed normal value**

#### **7.5.1 Australian Paper's claims**

In addition to providing information about domestic selling prices of copy paper in China, Australian Paper constructed a normal value for A4 and A3 copy paper. It estimated that one exporter – UPM Kynmene Changshu (UPM) – was responsible for 75% of exports of copy paper to Australia and focussed its calculations on the CTMS and profit that would be applicable to UPM. Australian Paper constructed normal values for the period July 2009 to June 2013 on a quarterly basis.

Australian Paper provided detailed spreadsheets showing the derivation of the assumptions used in the normal value construction. It is apparent from the detail provided that Australian Paper has gone to extensive efforts to carefully consider each expenditure item and profit that would be applicable to UPM's manufacture of copy paper for the domestic market.

The major cost inputs and assumptions are set out in some detail at pages 54 to 59 of the non-confidential version of the application.

Australian Paper also accounted for adjustments to calculate normal values at the FOB price. These adjustments are set out at pages 60 to 61 of the non-confidential version of the application.

#### **7.5.2 The Commission's assessment**

The Commission reviewed documentation provided by Australian Paper and considers the assumptions are reasonable. It also verified that the calculations were accurate. Australian Paper has supported its estimates with information that is reasonably available to it and, where assumptions have been made, has explained the basis for those assumptions. Where appropriate, the applicant has used data from independent sources.

For some cost elements Australian Paper has used data from its own operations and made deductions to adjust the costs to what it considers are relevant in the Chinese market. The size of some of these deductions is not supported by evidence in some cases; however the Commission considers that they are conservative. In addition, based on the relative contribution of those cost elements to the overall CTMS even if one or more of those assumptions was understated it is unlikely to result in an estimated dumping margin below a negligible level.

The Commission has relied on the constructed normal values calculated by Australian Paper in its application.

### **7.6 Dumping margins**

The dumping margin for copy paper for the investigation period, 1 July 2012 to 30 June 2013, calculated by Australian Paper and provided in its application, using the constructed normal value discussed above, is 32%. The dumping margin calculated by Australian Paper based on actual domestic selling prices is significantly higher.

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The Commission is satisfied that, based on the information submitted in the application, Australian Paper has demonstrated that there appear to be reasonable grounds for concluding that copy paper has been exported to Australia from China at dumped prices.

### **7.7 Import volumes**

From the information available from ACBPS's import database, it appears that imports of copy paper from China represented more than 3% of the total import volume of copy paper during the proposed investigation period (1 July 2012 to 30 June 2013) and are therefore not in negligible volumes as defined in s.269TDA of the Act.

## **8 REASONABLE GROUNDS - ECONOMIC CONDITION OF THE AUSTRALIAN INDUSTRY**

### **8.1 Findings**

Having regard to the information contained in the application, and to other information considered relevant, the Commission is satisfied that Australian Paper appears to have experienced injury in the form of:

- loss of sales volumes;
- loss of market share;
- price depression;
- lost of profit;
- reduced profitability;
- reduced revenue;
- reduced return on investment; and
- reduced employment.

### **8.2 Legislative framework**

Subsection 269TC(1) of the Act requires that the Commissioner must reject an application for a dumping duty notice if, *inter alia*, the Commissioner is not satisfied that there appears to be reasonable grounds for the publication of such a notice.

Under s.269TG of the Act, one of the matters that the Minister must be satisfied of to publish a dumping duty notice is that, because of the dumping, material injury has been or is being caused or is threatened to the Australian industry producing like goods.

### **8.3 Injury claims**

In respect of copy paper, Australian Paper claimed that the Australian industry has been injured through:

- loss of sales volumes;
- loss of market share;
- price depression;
- reduced revenue;
- reduced return on investment; and
- reduced employment.

### **8.4 Commencement of injury**

Australian Paper submitted that material injury caused by importation of copy paper has occurred mid-2011, though imports of Chinese copy paper have been present before this time at decreasing export prices.

## 8.5 Approach to injury analysis and available data

The injury analysis detailed in this section is based on the financial information submitted by Australian Paper and import data from ACBPS's import database. The Commission will examine the Australian market and the economic condition of the industry from 1 January 2010 for the purposes of injury analysis.

Australian Paper provided production, cost and sales data for copy paper in aggregate (all products combined), as well as separately for A4 and A3 copy paper by categories of percentage of recycled pulp content.

In relation to sales, the data was provided on a quarterly basis for the period January 2010 to June 2013 (half year 2013). Detailed sales data (to invoice-level detail) was provide for the 18 month period January 2012 – June 2013. This detailed sales data also included information as to product label (i.e. REFLEX<sup>®</sup>, customer brands, etc).

For production and costs, the information was provided on a quarterly basis for the period January 2011 to June 2013.

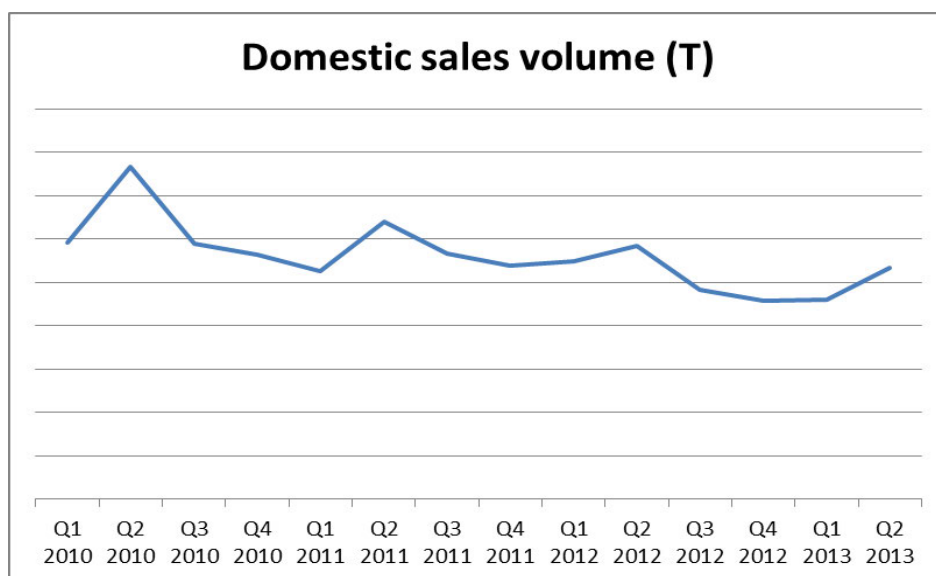
This costs and sales data has been used as the primary basis for the purpose of assessing the economic condition of the Australian industry. Where appropriate, the data has been annualised and pro-rated (for Australian Paper's financial year 2013 (January – December)).

Australian Paper does not sell its product to any related entities but does export a significant volume of copy paper.

## 8.6 Volume effects

### 8.6.1 Sales volume

The following graph shows Australian Paper's quarterly domestic sales volumes for copy paper (all product aggregate) for financial years 2010 to 2012, and the first half of 2013.



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Figure 2: Australian Paper domestic sales (all product aggregate)

This graph shows that Australian Paper's domestic sales volumes of copy paper have fluctuated over the period based on the data provided, but have generally trended downwards and ended lower than the levels seen towards the beginning of the period.

The below graph shows Australian Paper's quarterly domestic sales volume for its highest volume product category (sheet size and percentage of recycled pulp content). This product represents the majority of Australian Paper's domestic sales volume.

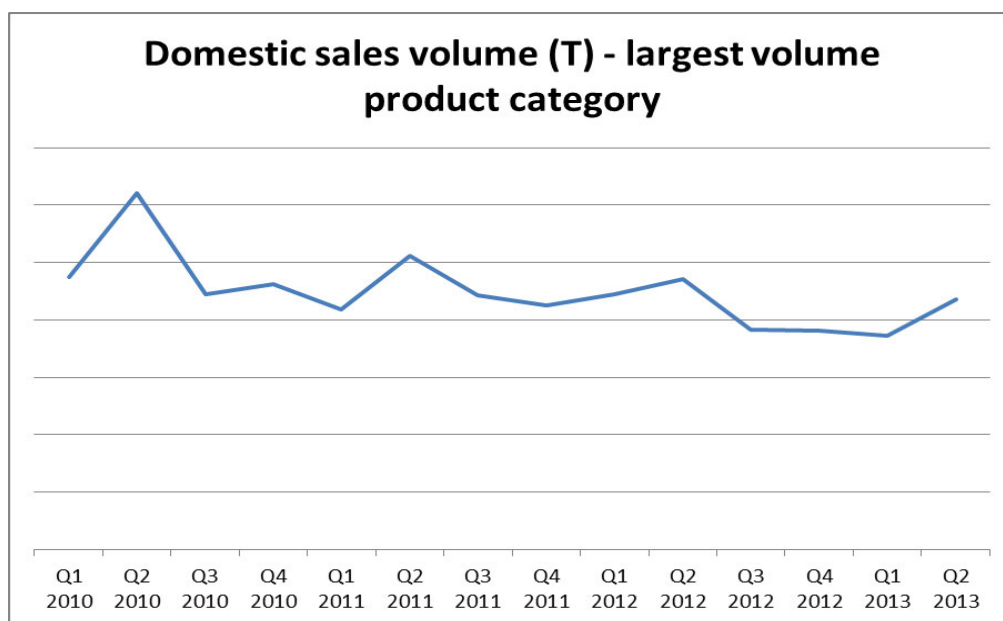


Figure 3: Australian Paper domestic sales (largest volume domestic product category)

The above chart follows similar trends to that shown at Figure 2, with sales volume for this product ending lower than the levels seen at the start of the period examined.

This analysis is contained in **Confidential Appendix 4**.

### 8.6.2 Market share

The following graph shows movements in market share by volume, including Australian Paper's share, in the Australian market for copy paper from Australian Paper's financial year 2012 to 2013 (pro-rated).

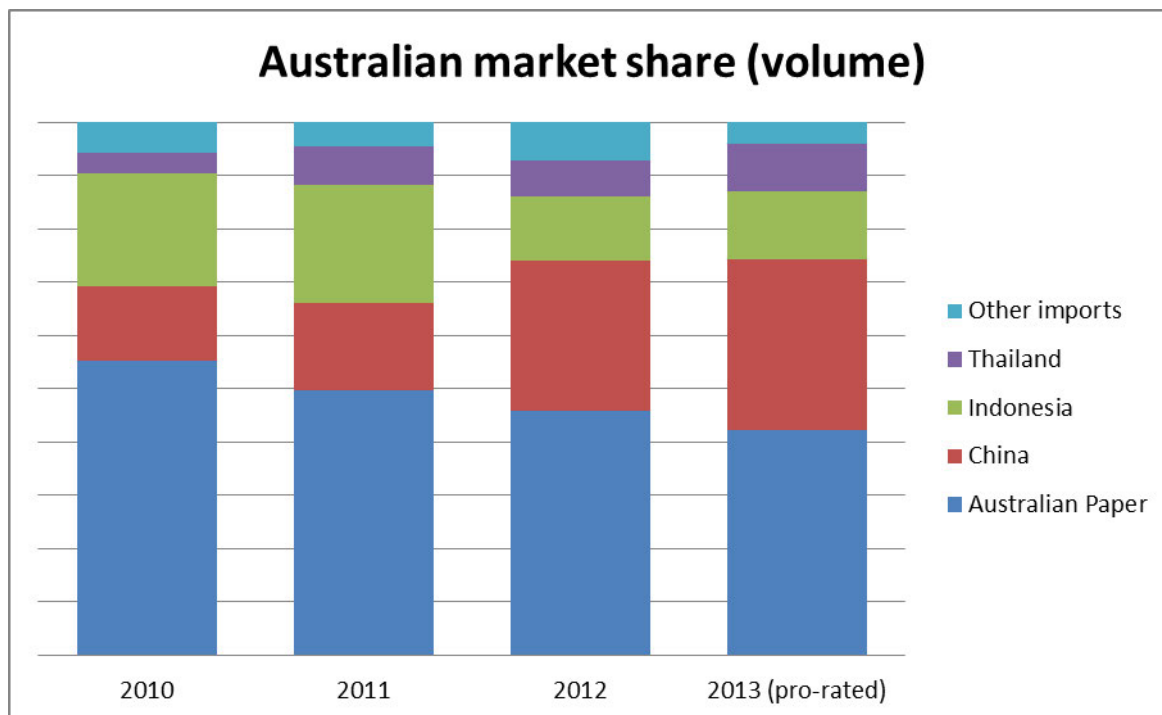


Figure 4: Australian copy paper market share (by volume)

The graph shows that Australian Paper's market share in the Australian market for copy paper has decreased year on year throughout the period examined.

At the same time, the market share held by Chinese imports of copy paper has increased, with a significant increase in 2012 followed by a less pronounced increase in 2013.

In addition, imports from Thailand have increased from 2010 levels (though still representing only a minor portion of the market), while the market share of Indonesian and other country imports have decreased overall (noting that imports from countries other than China, Indonesia and Thailand only represent a small portion of the Australian market (approximately 5%)).

This analysis is included in Confidential Appendix 2, along with the previously discussed market size analysis.

## 8.7 Price effects

Price depression occurs when a company, for some reason, lowers its prices. Price suppression occurs when price increases, which otherwise would have occurred, have been prevented. An indicator of price suppression may be the margin between revenues and costs.

The following graph shows the movements and relationships of Australian Paper's unit net revenue and CTMS for copy paper from Australian Paper's financial year 2011 to June 2013.

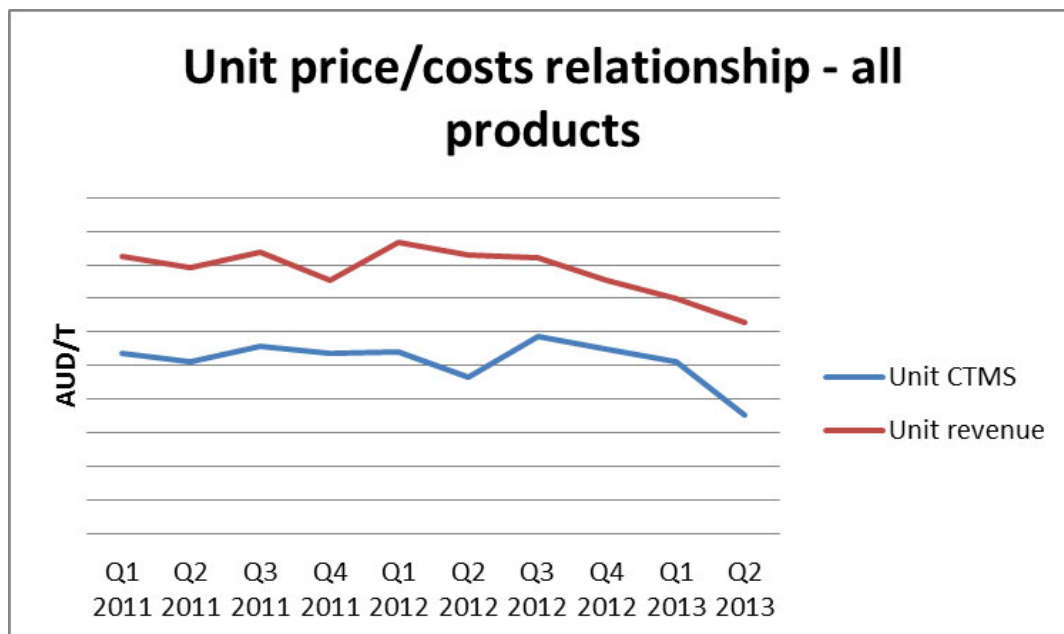


Figure 5 – Australian Paper unit copy paper CTMS and revenue (all product aggregate)

The above graph shows that unit prices have fallen over the two-and-a-half year period, while unit costs have also decreased at similar levels. An increase in unit costs in Q3 2012 coupled by a less pronounced decrease in selling prices (i.e. a narrowing of Australian Paper's margin between price and CTMS) is observed.

The below graph shows the price/cost relationship for Australian paper's largest domestic volume product, which makes up the majority of Australian Paper's sales volume and revenue for copy paper. Similar trends to those observed in Figure 5 are observed in relation to this product.

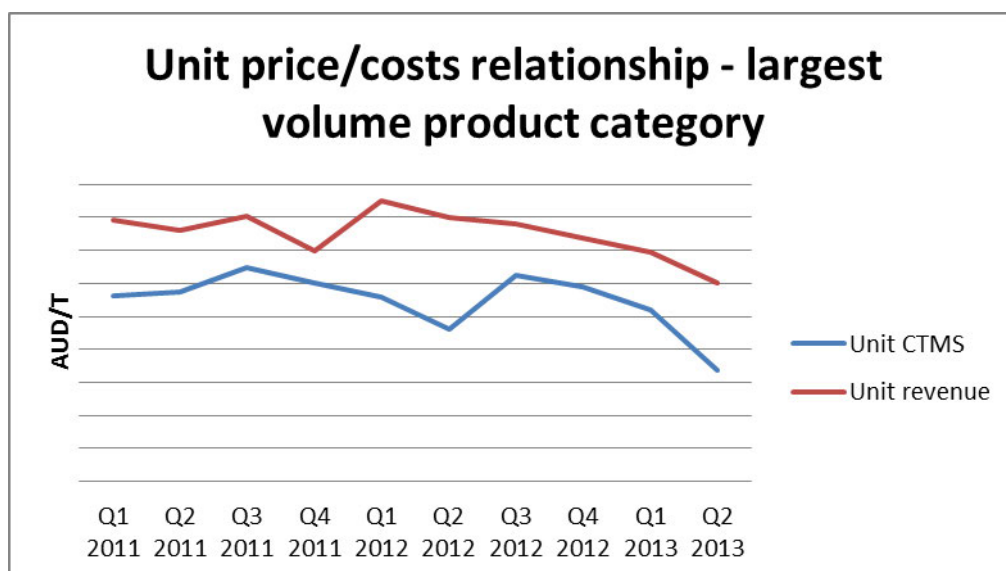


Figure 6 – Australian Paper unit copy paper CTMS and revenue (largest volume domestic product category)

## 8.8 Profit effects

The following graphs show movements in Australian Paper's unit profits and profitability (profit as a percentage of sales revenue) for copy paper from the company's financial year 2011 to June 2013, separately for all products combined and for the highest domestic volume product sold by Australian Paper.

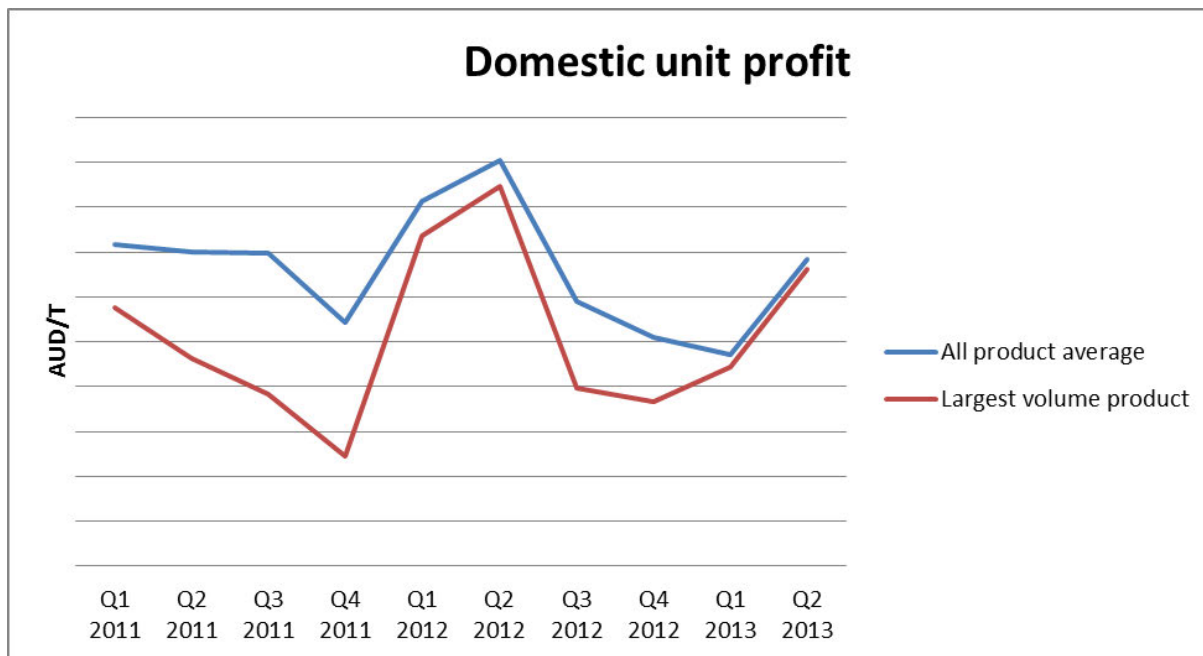


Figure 7 – Australian Paper unit copy paper profit

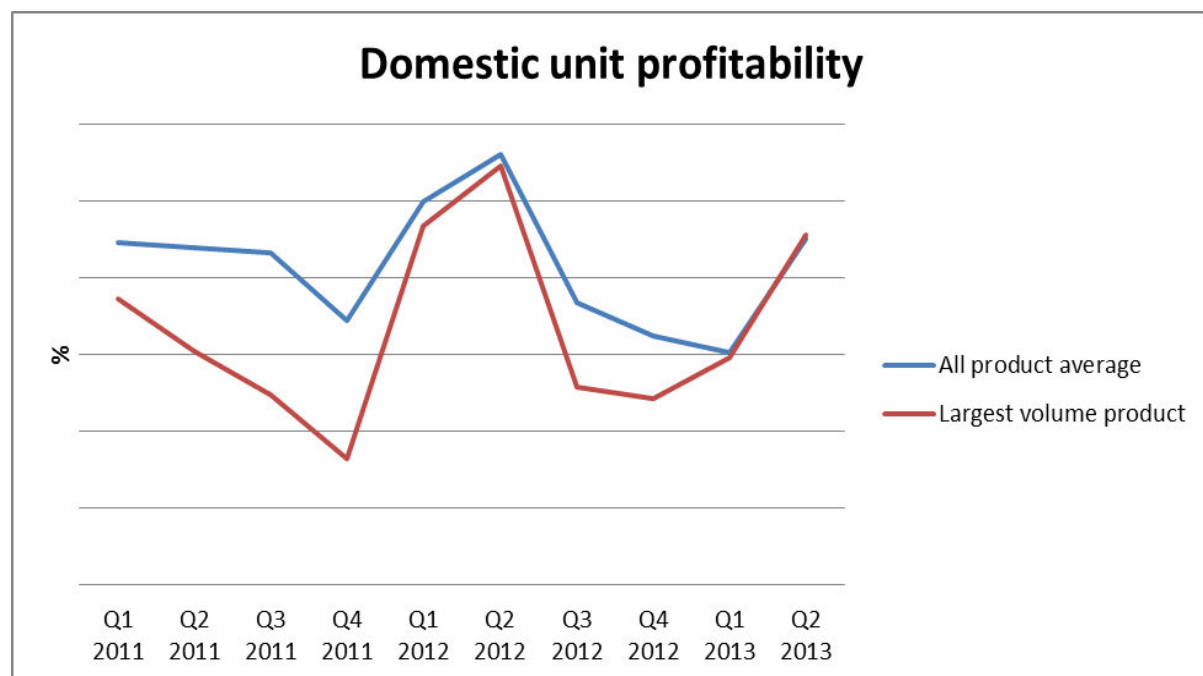


Figure 8 – Australian Paper unit copy paper profitability

These graphs show that Australian Paper's unit profit and profitability for all products experienced a downward trend from the second quarter of 2012, improving only in

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the second quarter of 2013. Improvement in the profit and profitability of the largest volume product commenced from the first quarter of 2013.

The following graph shows movements in Australian Paper's total profit for copy paper from the company's financial year 2011 to June 2013, separately for all products combined and the highest volume product sold by Australian Paper.

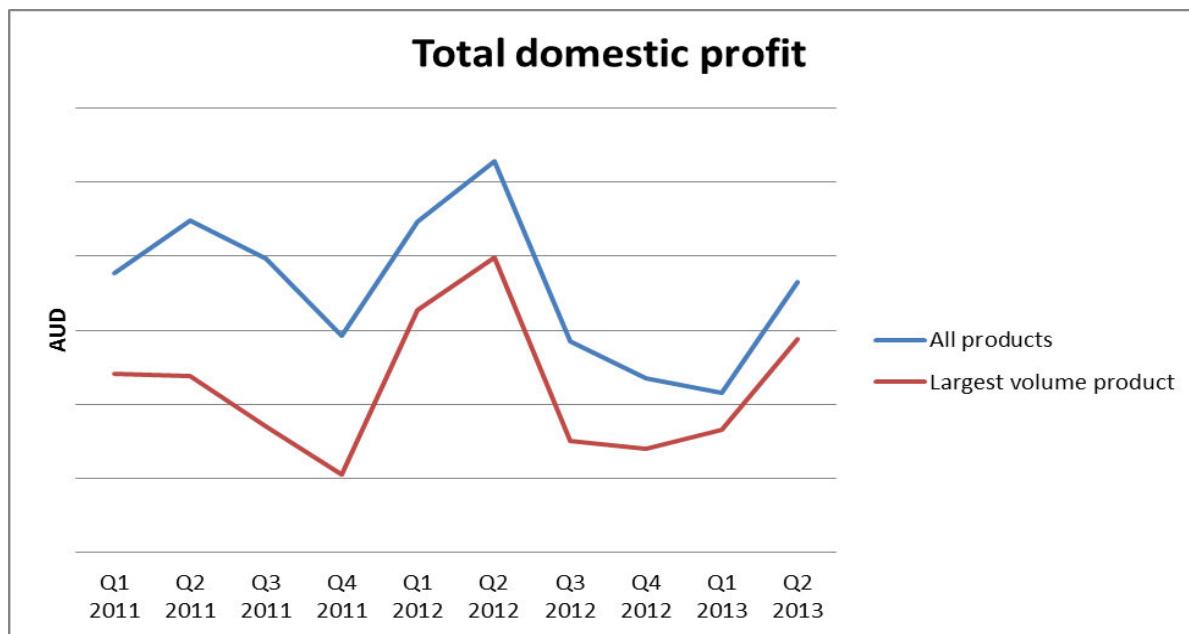


Figure 9 – Australian Paper total copy paper profit

The graph mirrors the trend in unit profit, with profit trending downwards from quarter two of 2012 but recovering in the second quarter of 2013.

This analysis forms **Confidential Appendix 5**.

### 8.9 Summary of major injury indicators

Based on the preliminary analysis detailed above, there appear to be reasonable grounds to support the claim that Australian Paper has experienced injury in the form of:

- loss of sales volume;
- loss of market share;
- price depression;
- loss of profit; and
- reduced profitability.

Price suppression is not evident from the data provided with the application but this will be further explored during the investigation.

The degree of injury experienced by Australian Paper in terms of volume and price factors appears to be material.

### 8.10 Other injury factors

#### 8.10.1 Australian Paper's claims

Australian Paper claims that it has experienced injury in respect of the following other injury factors:

- reduced revenue;
- reduced return on investment; and
- reduced employment.

Australian Paper completed a Confidential Appendix A7 for copy paper for the period January 2011 to June 2013 to support these claims.

The Commission has reviewed the data contained in Confidential Appendix A7 and identified, in respect of copy paper, the following trends for other injury factors.

- Assets: the value of assets used in the production of copy paper showed a minor decrease over the period (Australian Paper has submitted this is likely due to the changing product mix made on common machines).
- Capital investment: the level of capital investment in relation to the production of copy paper showed a minor decrease over the period.
- Return on investment: the return on investment associated with copy paper fell significantly over the period.
- Revenue: the revenue in relation to sales of copy paper fluctuated over the period and ultimately ended at a similar level at the end of the period as to that of the start.
- Capacity: the production capacity in relation to copy paper fell significantly over the period, being displaced by other production capacity.
- Capacity utilisation: capacity utilisation in relation to production of copy paper fell significantly over the period, being displaced by other production capacity utilisation.
- Employment: the numbers of employees used in the production of copy paper showed a significant decrease over the period.

#### 8.10.2 The Commission's assessment – other economic / injury factors (including revenue effects)

Based on the information contained in the application there appears to be reasonable grounds to support the claim that Australian Paper has experienced injury in the form of:

- reduced domestic revenues;
- reduced capacity and capacity utilisation;
- reduced employment; and
- reduced return on investment.

## 9 REASONABLE GROUNDS - CAUSATION FACTORS

### 9.1 Findings

Having regard to the matters contained in the application and to other information considered relevant, the Commission is satisfied that the goods under consideration exported to Australia from China at allegedly dumped prices appear to have caused material injury to the Australian industry.

#### 9.1.1 The applicant's claims

Australian Paper claims that material injury, as outlined in section 8 of the report, can be attributed to the dumped imported Chinese copy paper. Australian Paper submitted data sourced from the ABS to demonstrate trends in the volume and price of Chinese exports of copy paper.

Australian Paper submits that, from 2011 onwards, the volume of dumped imported copy paper from China increased substantially, while the export price of Chinese copy paper has steadily declined since 2009.

Australian Paper submits that the export price of Chinese copy paper has consistently undercut its own prices, in both its own manufacturer brand and private label (customer brand) products. To support this, Australian Paper submitted the below chart of its own data and ABS export prices, which Australian Paper converted from cost, insurance and freight (CIF) prices to delivered prices by adding customs duty, clearance and port charges, and inland freight (to allow proper comparability to Australia Paper's free into store (FIS) prices).

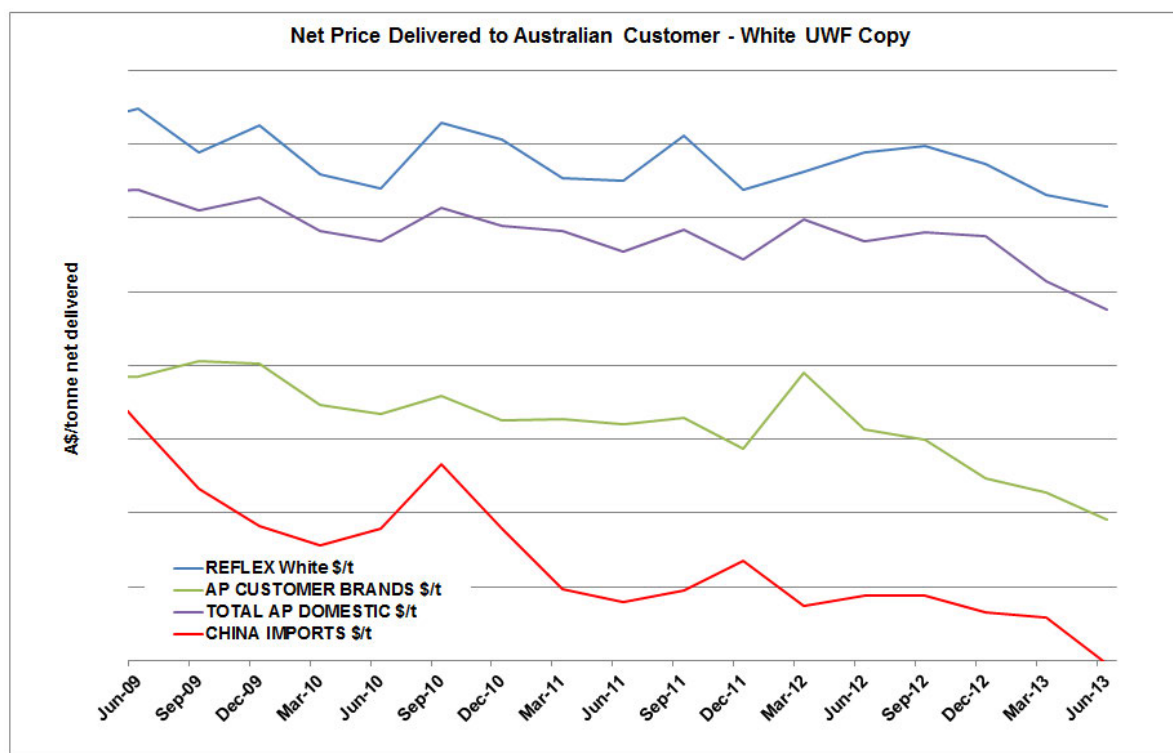


Figure 10 – Australia Paper comparison of unit Chinese export prices to its own unit prices

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It is understood that the term 'UWF' in the above chart relates to 'uncoated' paper.

Australian Paper submits that the lowering Chinese export price continues to lead the overall market price downward, noting that resellers and buying groups apply pressure to the Australian industry and suppliers of other copy paper to match or better the Chinese prices. As discussed in Section 6.4.3, Australian Paper considers that price is the driving factor in the market.

Australian Paper observes that, due to the nature of the manufacturing process of copy paper (high capital base and high fixed costs) it must avoid down time and continue to produce copy paper regardless of market conditions. As a result, Australian Paper claims it has been driven to sell copy paper at reduced (depressed) prices to match the low market price to be able to sell the volume of copy paper produced (and/or to seek other markets for its product). Australian Paper submits that:

“This price depression results in considerable material injury, which, in turn, affects Australian Paper's ability to invest in the equipment, facilities and research needed to remain abreast of market developments.”

In addition, Australian Paper submits that, despite these efforts to 'follow' the dumped Chinese export prices, Chinese imports have managed to increase in volume, which has displaced sales volume and market share held by Australian Paper as well as other import sources (while the market size itself remained relatively stable). Australian Paper highlights that Chinese import volumes now exceed the volume of all imports from other sources.

Australian Paper submits that, since the noted increase in Chinese sales volumes began in 2011, the company has managed to maintain production levels and increasingly sell copy paper into other markets, as well as controlling its input costs and improving its productivity. Australia Paper observes that these changes have allowed the company to hold its cost to make at stable levels and slightly reduce its selling costs.

In its application, Australian Paper identified two other possible injury sources as being:

- a generally slow worldwide economy since the global financial crisis (GFC) which has reduced global paper demand, resulting in a surplus of capacity globally (particularly in China where capacity expansion was already underway); and
- the high Australian dollar relative to the US dollar, which is the currency of the international paper trade.

Australian Paper identified that the global downtrend has suppressed and depressed prices in most markets, making Australian Paper's performance in the Australian market more critical to its survival.

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In relation to exchange rates, Australian Paper submits that it considers the exchange rate to not significantly alter the level of dumping from China, submitting a comparison between its calculated dumping level and the USD/AUD exchange rate. Australian Paper further highlighted that it considers that the high exchange rate has made injury from dumping a 'much more critical issue', as the majority of Australian Paper's inputs are sourced locally in AUD.

### **9.1.2 The Commission's assessment**

The Commission has assessed the data and information submitted in the application, as well as other data available to it (predominantly that in the ACBPS import database).

#### Volume effects

Using available information, the Commission estimates that the Australian industry's share of the Australian market declined by more than 10% from 2010 to 2013. The market share of imports of copy paper from China appear to have increased by close to 20% over the same period. At the same time, Australian Paper's annual sales volume decreased by approximately 25%, while Chinese import volumes increased by over 55% (while the market itself grew only 3%).

The Commission considers this to be evidence that the Australian industry has lost sales volume and market share to Chinese copy paper.

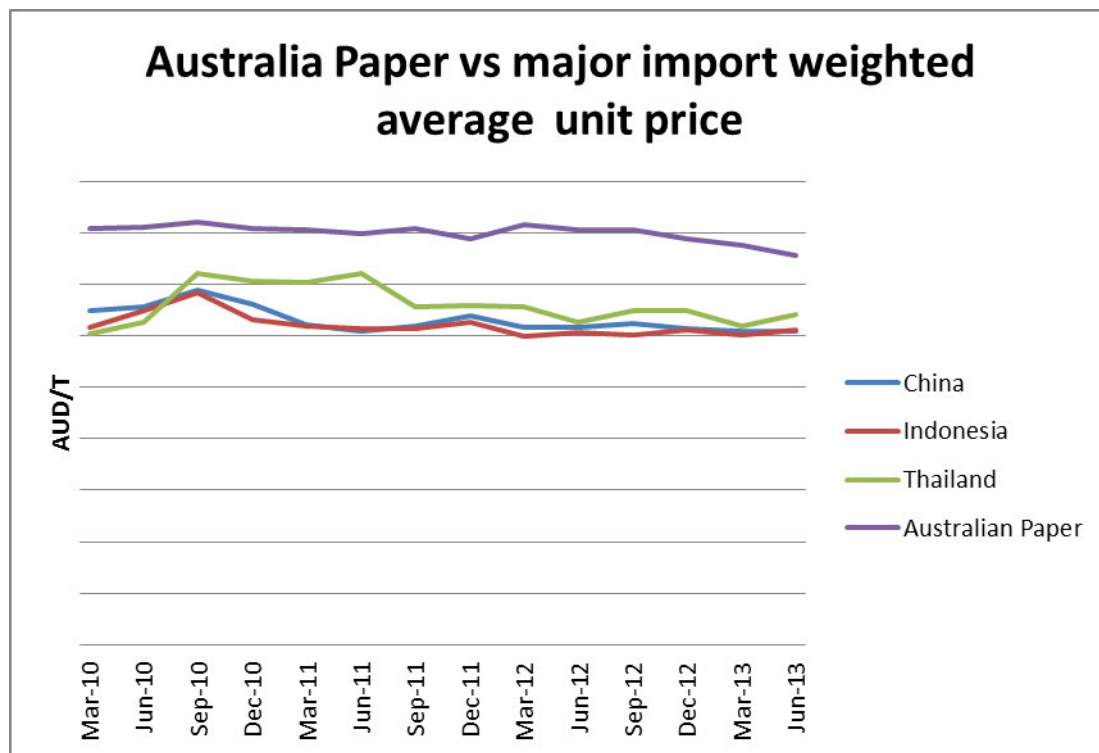
#### Price effects

As discussed in Section Australian Paper's overall unit selling price and the unit selling price for the company's largest volume domestic product have declined since 2011.

The below chart demonstrates the relationship between Australian Paper's 'all product' aggregate weighted average unit selling price and the weighted average export price of the import sources during the period January 2010 – June 2013.

For the purposes of this chart, the FOB export price of imported copy paper has been converted to a FIS price by adding insurance and freight, customs duty, port and clearance charges and inland freight.

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**Figure 11 – Australian Paper/export price comparison**

The above chart demonstrates that the weighted average Chinese, Thai and Indonesian prices for copy paper have undercut the selling price of Australian Paper's products for the duration of the period examined.

Throughout this period, the Chinese price declined but remained similar to the Indonesian imported copy paper unit price, ending the period slightly below the Indonesian price.

The graph also demonstrates that the Thai imported copy paper unit price increased over the period, commencing the period as the lowest export price and concluding the period as the highest (from the three main sources of imports examined in the above graph).

### Non-injurious price

As an additional test of whether there is a causal link between the alleged dumping and material injury, the Commission sought to compare export prices from each of the nominated countries to estimates of a non-injurious price (NIP) for the year ending June 2013.

In assessing how to calculate this NIP, the Commission considered the most reasonable method to arrive at an unsuppressed selling price (USP) for Australian Paper for the year ending June 2013. Having regard to the fact that the Chinese products have been present in the market for several years (prior to the commencement of the injury period) and the alleged quantum of the dumping discussed in this report, the Commission considers that it is most reasonable to rely on Australian Paper's current costs plus a profit from a period that the company considers it was not being injured by dumping (prior to mid-2011) to derive a USP.

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This is as opposed to actual industry selling prices or prices of imports from Indonesia and/or Thailand (noting the Commission has not yet assessed whether these prices themselves have been affected by the allegedly dumped Chinese copy paper).

Consequently, the Commission has calculated the USP for Australian Paper for the year ending June 2013 as:

- the company's full weighted average cost to make and sell for all products in aggregate for the period January – June 2013; plus
- the profit achieved (as an all product aggregate) by Australian Paper in the period January to June 2011

as reported in Appendix A-6.1 in the company's application.

The Commission then deducted amounts from that USP for a reasonable estimate of importer SG&A and profit, as well as importer 'into-store' costs, customs duty and overseas freight. These calculations provided for a NIP at an FOB level, which is suitable for comparison to an FOB export price.

The Commission then compared this product-aggregate NIP with the weighted average export price for both examined tariff classifications combined (an A4 and A3 aggregate export price) for the year ended June 2013. This comparison showed that the weighted average export prices for the year were below the NIP. The Commission regards this finding as being consistent with the Australian Paper claim that the allegedly dumped goods have caused material injury.

Calculations of the USP and NIP, and its comparison with the FOB export price, form **Confidential Appendix 7**.

### Conclusion

The price undercutting demonstrated in Figure 11 appears to have caused the Australian industry to reduce its unit selling prices in order to compete with Chinese imports of copy paper. However the Australian industry has been unable to maintain its domestic sales volume and market share in any case. This has adversely affected Australian Paper's revenue. Decreases in the company's costs over the period (see Section 6.5.3) have enabled Australian Paper to maintain profits and profitability.

The apparent loss of sales volume, price undercutting and price depression indicate that the allegedly dumped imports from China caused injury to the Australian industry. The estimated product dumping margin for imports from China outlined in Chapter 7 is considered material. On the available information, the injury caused by the dumping appears to be material.

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The impact of the USD/AUD exchange rate and the overall market downturn since the GFC will be considered further during the investigation.<sup>4</sup> In addition, the impact of price undercutting by Thai and Indonesian imports (which themselves have lost market share and volume to Chinese copy paper) will be assessed.

### **9.2 Conclusion on material injury caused by dumped imports**

The Commission is satisfied that, based on the information submitted in the application, the applicant has demonstrated that:

- it appears to have suffered injury; and
- there appear to be reasonable grounds for concluding that the dumping of copy paper exported to Australia from China has caused material injury to the Australian industry producing like goods.

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<sup>4</sup> Noting that the assessment in this report of material injury caused by dumping relates to a period after the conclusion of the GFC and shows there appears to be reasonable grounds for these factors to be established wholly within the post-GFC period examined.

## 10 CONCLUSION

The Commission has examined the application in respect of copy paper and is satisfied that:

- the application complies with s.269TB(4) of the Act;
- there is an Australian industry in respect of like goods; and
- there appear to be reasonable grounds for the publication of a dumping duty notice in respect of copy paper exported to Australia from China.

Accordingly, the Commissioner has not rejected the application for the publication of a dumping duty notice under s.269TC(1) of the Act.

For the purposes of the investigation:

- the investigation period to determine whether dumping has occurred will be from **1 July 2012 to 30 June 2013**; and
- the Commission will examine the Australian market and the economic condition of the industry from **1 January 2010** for the purposes of injury analysis.

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### 11 APPENDICES AND ATTACHMENTS

APPENDIX	TITLE
Appendix 1	Public notice
Confidential Appendix 2	Estimate of the Australian market size and share for copy paper
Confidential Appendix 3	Comparison of ABS data to ACBPS import data
Confidential Appendix 4	Domestic sales volume and price analysis
Confidential Appendix 5	Price/costs relationship, profit and profitability analysis
Confidential Appendix 6	Price undercutting analysis
Confidential Appendix 7	Non-injurious price calculations
Attachment 1	Recommendation minute to Delegate
Attachment 2	Delegate's instrument



***Customs Act 1901 – Part XVB***

**Copy paper**

**Exported from the People's Republic of China**

**Initiation of an Investigation into Alleged Dumping**

***Public notice under section 269TC of the Customs Act 1901***

The Anti-Dumping Commissioner (the Commissioner) has initiated an investigation following an application lodged by Australian Paper Pty Ltd, a manufacturer of white uncoated A4 and A3 cut sheet paper in Australia. The application seeks the publication of a dumping duty notice in respect of copy paper exported to Australia from the People's Republic of China (China).

The goods subject of the application are white uncoated A4 and A3 cut sheet paper (copy paper) ("the goods").

A full description of the goods is available in Anti-Dumping Notice (ADN) No. 2013/79. This ADN is available on the internet at [www.adcommission.gov.au](http://www.adcommission.gov.au).

The goods are currently classified to the following tariff subheadings:

- 4802.56.10, statistical codes 03 and 09; and
- 4802.56.90, statistical code 19

of Schedule 3 to the *Customs Tariff Act 1995*. The application observes that tariff subheading 4802.56.10 refers to A4 copy paper and 4802.56.90 relates to A3 copy paper. These goods are subject to 5% Customs duty.

The application alleges that the goods have been exported to Australia at prices less than their normal value and that the dumping has caused material injury to the Australian industry through:

- reduced market share;
- reduced revenues;
- price depression;
- reduced sales volumes;
- reduced profits and profitability;
- reduced research and development;
- reduced return on investment; and
- reduced employment.

The non-confidential version of the application, which contains the basis of the alleged dumping, is available on the public record.

The Commissioner specifies that the goods exported to Australia during the period 1 July 2012 to 30 June 2013 will be examined to determine whether dumping has occurred. The Australian market will be examined from 1 January 2010 for injury analysis.

The date of initiation of this investigation is the date of publication of this notice.

Interested parties, as defined by subsection 269T(1) of the *Customs Act 1901* (the Act), are invited to lodge submissions concerning the publication of the dumping duty notice sought in the application, no later than the close of business on 19 November 2013, addressed to:

The Director  
Operations 2  
Anti-Dumping Commission  
Customs House  
5 Constitution Avenue  
Canberra ACT 2601

Or by email [operations2@adcommission.gov.au](mailto:operations2@adcommission.gov.au) or by fax to 1300 882 506 or +61 2 6275 6888 (outside Australia).

ADN 2013/79, containing important procedural details is available at [www.adcommission.gov.au](http://www.adcommission.gov.au) and should be read in conjunction with this notice.

Particulars of the reasons for the decision to initiate this investigation are shown in *Anti-Dumping Commission Consideration Report No. 225*, which has been placed on the Commission's public record.

Documents included in the public record are available at [www.adcommission.gov.au](http://www.adcommission.gov.au). Alternatively, the public record may be examined at the Commission office by contacting the case manager on the details provided below.

Enquiries about this notice may be directed to the case manager on telephone number 02 6275 6129, fax number 1300 882 506 or email [operations2@adcommission.gov.au](mailto:operations2@adcommission.gov.au).

Scott Wilson  
Acting National Manager Operations  
Anti-Dumping Commission

10 October 2013