

Attn Ms. Gibson,

Further to our recent discussions, and in response to the ADC investigation into White uncoated A4 & A3 cut sheet paper (copy paper) from Peoples Republic of China, we wish to put forward the following summary/overview of our position in the supply chain of said goods.

I am writing on behalf of both our Singapore-based Head Office (Vital Solutions Pte Ltd), and also our Australian Sales Office (Vital Solutions (Aust) Pty Ltd). Given we (Vital Solutions) are not the manufacturer, we have not made a response to all questions in the Export Questionnaire (the manufacturer is preparing a fully-completed version of that document), however we have made reference to the various sections of your Questionnaire where appropriate.

Our company – Vital Solutions – is a paper trading company with offices around the world. Our contact details for your records are as follows...

A1 & A2:

Vital Solutions Pte Ltd

77 Robinsons #14-01

Robinson 77

Singapore 068896

Tel +65 6325 9239

Fx. +65 6221 1044

Email – via patrick@vitalgroup.com.au

Vital Solutions (Aust) Pty Ltd

4 Lakewood Boulevard

Carrum Downs Victoria 3201

AUSTRALIA

Ph. +61 3 9775 0303

Fx. +61 3 9708 2219

Email – via patrick@vitalgroup.com.au

(please direct all communication to Patrick Weaver – contact details as above)

Vital Solutions does not manufacture the goods in question, nor do we sell them into the Chinese domestic market. We act as the Australian sales representative for our principal – their details...

Zhanjiang Chenming Pulp & Paper Co Ltd – a wholly-owned subsidiary of Shandong Chenming Holdings Limited which is listed on both the Chinese and Hong Kong Stock Exchanges...

Shandong Chenming Paper Holdings Limited

595 Sheng Cheng Road,

Shouguang 262700, Shandong

CHINA

Ph. +86 (536) 5280011

Fx. +86 (536) 5221843

www.chenmingpaper.com

B1:

During the investigation period there was [REDACTED] sales volume into Australia of the goods in question ("the goods"). [REDACTED]

[REDACTED]
[REDACTED] (detail of customer A)

[REDACTED]
[REDACTED] (detail of customer B)

B2(a):

[REDACTED]
[REDACTED] (explains export incoterms and export trading terms)
[REDACTED]

[REDACTED]
[REDACTED] (explains responsibilities for cost inputs beyond export incoterms, and terms of trade to Australian customers)

B2(b):

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED] (breakdown of B2(a) for customer A)

[REDACTED]
[REDACTED] (breakdown of B2(a) for customer B)

B2(c):

VSS retain title to goods until such time as invoice is settled

B2(d):

Not applicable

B2(e):

Price is negotiated when/as required from any party. Prevailing market prices and input costs are the major influences on price. Orders are typically received on a monthly basis depending on customer demand. Once goods are ready containers are ordered and goods are packed and shipped. Invoices are raised once goods are packed and ready for shipment

B2(f):

There is no relationship between the manufacturer and any of its Australian customers

B2(g):

There are currently no forward orders for the goods in question

B3:

Refer to manufacturer submission

B4:

A spreadsheet for Australian sales is attached [REDACTED]
[REDACTED]

B5:

Refer to spreadsheet [REDACTED]
[REDACTED]

Orders highlighted in yellow were shipped/invoiced during the investigation period

B6:

Not applicable

B7:

Not applicable

B8:

Not applicable

B9:

Documents attached

Section C – G:

Manufacturer will be responding

Summary:

Chenming Paper Holdings Ltd commenced production of the goods in question at its Zhanjiang facility in 2011. Following start up and leading into the investigation period, Chenming and Vital Solutions have had [REDACTED] sales volumes to the Australian market of the goods in question.

Chenming – and Vital Solutions – have maintained what we believe to be a fair and reasonable price for our copy paper, and have not followed market prices down. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

(estimated market share and
estimated price position of our
volume across the investigation
period)

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Yours Sincerely,

Vital Solutions (Aust) Pty Ltd – and on behalf of Vital Solutions Pte Ltd

Patrick Weaver

4th December, 2013