APPLICATION FOR ANTI-DUMPING DUTIES on imports of Structural Timber

Structural Tillibei

exported from

Austria, Canada, Czech Republic, Estonia, Germany, Lithuania, Sweden and the USA

August 2011

AUSTRALIAN CUSTOMS SERVICE

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Application for Dumping and Countervailing Duties

DECLARATION

	est in accordance with Section 269TB of the Customs Act 1901 that the er publish in respect of goods the subject of this application:
	a dumping duty notice, or
	a countervailing duty notice, or
	a dumping and a countervailing duty notice
to the i	pplication is made on behalf of the Australian industry producing like good imported goods the subject of this application. The application is supported stralian producers whose collective output comprises:
•	25% or more of the total Australian production of the like goods; and
•	more than 50% of the total production of like goods by those Australian producers that have expressed either support for, or opposition to, this application.
l believ	ve that the information contained in this application:
•	provides reasonable grounds for the publication of the notice(s requested; and is complete and correct.
Signatu	ure:
Name:	John O'Connor
Position	n: Director
Compa	any: John O'Connor and Associates Pty Ltd
ABN:	39 098650 241
Date:	1 1

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PART A

INJURY TO AN AUSTRALIAN INDUSTRY

IMPORTANT

All questions in Part A should be answered even if the answer is 'Not applicable' or 'None'. If an Australian industry comprises more than one company/entity, each should separately complete Part A.

For advice about completing this part please contact the Customs Dumping Liaison Unit on:

2 (02) 6275-6066 Fax (02) 6275-6990

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A-1 Identity and communication.

Please nominate a person in your company for contact about the application:

This application is made on behalf of the Australian industry manufacturing structural timber. The companies that manufacture structural timber and have assisted in the preparation of this application include Building Supplies Group Holdings Pty Ltd, Hyne & Son Pty Ltd ("Hyne"), and Gunns Limited ("Gunns").

Building Supplies Group Holding Pty Ltd includes subsidiary companies that manufacture certain structural timber, including the market-identifiable entity CarterHoltHarvey Woodproducts Australia Ptv Ltd ("CHHWPA") as well as the legal entities that were previously owned by the Weyerhauser Group and purchased by Carter Holt Harvey in July 2008. CHHWPA is a subsidiary company of Building Supplies Group Holdings Pty Ltd and manufactures, markets and sells the goods the subject of this application. Due to CHHWPA's manufacturing, marketing and sales role as the "timber" entity within the Rank Group in Australia, CHHWPA has been referred to as the relevant industry member in this application.

The relevant contact names at each of the applicant companies is as follows:

CHHWPA

Contact Name:

Company and position:

Address:

Telephone: Facsimile:

E-mail address:

ABN:

lan Tyson General Manager - Timber, CHH Woodproducts Australia

(03) 9258 7629

22 Prospect St. Box Hill, Victoria, 3128. (03) 9258 7699

ian.tyson@chhwoodproducts.com.au 93 002 993 106

Alternative contact

Name:

Position in the company: Address:

Telephone: Facsimile:

E-mail address:

Tim Sherry

Marketing Manager - Timber, CHH Woodproducts Australia

22 Prospect St, Box Hill, Victoria, 3128

(03) 9278 1943

(03) 9258 7629

tim.sherry@chhwoodproducts.com.au

Hyne

Contact Name:

Company and position:

Address: Telephone:

Facsimile: E-mail address:

ABN:

Peter Hyne

Hyne & Sons Pty Ltd, General Manager Sales 26 Brickvard Road, Virginia, Queensland 4014

(07) 3131 3115 (07) 3865 2011

peter.hyne@hyne.com.au

67 009 660 995

Alternative contact

Name:

Chris Robertson Hyne & Sons Pty Ltd, General Manager - Queensland Softwood

Position in the company:

Address: 26 Brickyard Road, Virginia Q 4014

Telephone: (07) 3131 3115 Facsimile: (07) 3865 2011

E-mail address:

chris.robertson@hyne.com.au

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Gunns

Contact Name:

Christine Briggs

Company and position:

General Manager, Sales and Marketing, Gunns Timber Products

Address:

Lot 3B, 1490 Ferntree Gully Road, Knoxfield, Victoria 3180 (03) 9212 7481

Telephone: Facsimile:

(03) 9212 7401

E-mail address:

christine.briggs@gunns.com.au

ABN:

29 009 478 148

If you have appointed a representative to assist with your application, provide the following details and complete Appendix A8 (Representation).

Name:

Mr John O'Connor

Representative's business name: Address:

John O'Connor & Associates Pty Ltd P.O. Box 329, Coorparoo Qld 4151

Telephone: Facsimile: (07) 3342 1921 (07) 3342 1931

E-mail address:

imoconnor@optusnet.com.au

ABN:

39 098 650 241

A-2 Company information.

 State the legal name of your business and its type (eg. company, partnership, sole trader, joint venture). Please provide details of any other business names you use to manufacture/produce/sell the goods that are the subject of your application.

Details of each of the companies that are applicants for the purposes of this application are as follows:

CHH WPA

The name of the company is CarterHoltHarvey Woodproducts Australia Pty Ltd ("CHHWPA"). CHHWPA manufactures structural timbers at sites located in Mt Gambier, South Australia, and Morwell in Victoria. It also markets and sells structural timbers manufactured on its behalf at sites located in Turnut, New South Wales, Morwell in Victoria, and Caboolture, Queensland.

CHHWPA is also a 50:50 joint venture participant in a timber facility with Boral Limited located at Oberon, New South Wales. The other sites are wholly-owned by CHHWPA or by subsidiary or related companies in the Carter Holt Harvey Woodproducts Australia Group of companies.

Hyne

Hyne and Sons Pty Ltd ("Hyne") is a large privately-owned timber company that has operated since 1882. Hyne has structural timber mills located in Maryborough, Queensland and Tumbarumba. New South Wales.

Gunns

Gunns Limited ("Gunns") is a publicly listed company on the Australian Stock Exchange. Gunns has structural timber production facilities located at Tarpeena, South Australia, and Bell Bay in Tasmania (acquired in early 2011).

Application for Dumping Measures against imports of structural timber from Austria. Canada. Czech Republic. Estonia.	Ge
Lithuania, Sweden and the USA	

Provide your company's internal organisation chart. Describe the functions performed by each group within the organisation.

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Please refer to the following attachments for copies of the companies' organisational charts:

- CHHWPA Refer CHHWPA Confidential Attachment A-2.2;
- Hyne Refer Hyne Confidential Attachment A-2.2; and
- Gunns Refer Gunns Confidential Attachment A-2.2.
- List the major shareholders of your company. Provide the shareholding percentages for joint owners and/or major shareholders.

CHHWPA is owned 100 per cent by Carter Holt Harvey Australia Pty Ltd (ABN 77 000 601 892). Gunns is a publicly listed company on the Australian Stock Exchange – refer to Gunns Annual Report for details of the top 10 shareholders. Hyne is a privately-owned company.

 If your company is a subsidiary of another company list the major shareholders of that company.

Carter Holt Harvey Australia Pty Ltd is 100 per cent owned by Building Supplies Group Holdings Pty Ltd (ABN No. 88 121 366 041). This question does not apply to Gunns or Hyne as the companies are not subsidiaries of another company.

 If your parent company is a subsidiary of another company, list the major shareholders of that company.

This question only applies to CHHWPA. CHHWPA is ultimately owned by the holding company Rank Group Limited, a New Zealand company.

 Provide an outline diagram showing major associated or affiliated companies and your company's place within that structure (include the ABNs of each company).

Diagrams identifying affiliated or associated companies have been included as follows:

- CHHWPA refer to CHHWPA Confidential Attachment A-2.6;
- Gunns refer Gunns Confidential Attachment A-2.6.

Hyne does not have any other affiliated or associated companies.

7. Are any management fees/corporate allocations charged to your company by your parent or related company?

This question does not apply to Hyne. CHHWPA's and Gunns' Appendix A6.1 data includes allocations that can be linked to the production and sales of the goods the subject of the application.

 Identify and provide details of any relationship you have with an exporter to Australia or Australian importer of the goods.

The applicant companies do not have any relationships with the exporters or importers of the goods the subject of this application.

 Provide a copy of all annual reports applicable to the data supplied in Appendix A3 (Sales Turnover). Any relevant brochures or pamphlets on your business activities should also be supplied.

Copies of the most recent annual reports (where applicable) for each of the applicant companies are included with this application as follows:

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Application for Dumping Measures against imports of structural timber from Austria. Canada. Czech Republic. Estonia. Ge	many.	E49

- CHHWPA and its ultimate parent company Rank Group Limited are privately held

- companies and do not publish annual reports, however, the 2010 Building Service Group annual report has been included (on a confidential basis);
- Gunns -refer to Gunns 2010 Annual Report (provided in soft copy form) available at www.gunns.com.au; and
- Hyne is a private company and does not publish an annual report.

10. Provide details of any relevant industry association.

Lithuania, Sweden and the USA

The applicant companies are members of certain industry associations as follows:

- CHHWPA is a member of Australian Forest Products Association ("AFPA"), Housing Industry Association ("HIA"), Engineered Wood Products Australia Association (EWPAA), Timber and Building Materials Association ("TABMA");
- Gunns is a member of the Australian Plantation Products and Paper Industry Council;
- Hyne is a member of the following associations:
 - Australian Forest Products Association ("AFPA");
 - Timber Qld ("TQ");
 - Housing Industry Association ("HIA");
 - Timber and Building Materials Association ("TABMA");
 - Glue Laminated Timber Australian Association (GLTAA);
 - Engineered Wood Products Australia Association (EWPAA);
 - Treated Products Australia Association (TPAA);
 - Australian Forestry Contractors Association (AFCA); and
 - Forest Industries Engineers Association (FIEA).

A-3 The imported and locally produced goods.

- 1. Fully describe the imported product(s) the subject of your application:
 - · Include physical, technical or other properties.
 - Where the application covers a range of products, list this information for each make and model in the range.
 - Supply technical documentation where appropriate.

The imported goods the subject of this application is as follows:

"Structural timber, being coniferous wood that is sawn or chipped lengthwise, capable of being used in structural applications in accordance with the Building Code of Australia and that:

- · has a thickness exceeding 6mm; and
- has a cross-sectional area of less than 120cm²; and
 - is untreated or treated to meet the requirements of hazard class H1 or H2 as specified in Australian standard AS1604.1.

For clarification, the goods <u>do not</u> include weatherboards, laminated veneer lumber, glue laminated timber, or timber treated to a level above hazard class H2 but <u>do</u> include end-jointed or finger-jointed structural timber."

Structural timber is used in the production of frames and trusses and stick-built framing construction throughout Australia for housing, other dwelling, alterations and additions, commercial and industrial building.

2. What is the tariff classification and statistical code of the imported goods.

The applicants understand that the imported goods are included in the following sub-headings/statistical codes:

- 4407.10.10 statistical codes 22, 23, 24, 25 and 33.
 - 4407.10.99 statistical codes 08, 09, 10, 11, 12 and 13.
- 3. Fully describe your product(s) that are 'like' to the imported product:
 - · Include physical, technical or other properties.
 - Where the application covers a range of products, list this information for each make and model in the range.
 - Supply technical documentation where appropriate.
 - Indicate which of your product types or models are comparable to each of the imported product types or models. If appropriate, the comparison can be done in a table.

The Australian industry manufactures a range of structural timber from Australian plantation softwood. Locally manufactured structural timber is used in the housing and construction industries for wall frames, roof trusses, stick-built construction and alteration and additions to domestic and commercial constructions.

The Australian industry commonly manufactures structural timber in accordance with Australian Standard AS/NZS1748 - 2011 to meet the design properties and other utility requirements specified in AS1720¹ (both 1997 and 2010 versions whilst in transition to the latter Standard).

AS/NZS1748 - Timber-Solid-stress graded for structural purposes has two (2) parts:

- Part 1 General requirements; and
- Part 2 Qualification of a grading method.

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¹ AS1720 sets out limit state design methods for the structural use of timber, which are based on the principles of structural mechanics and on data established by research.

Part 1 outlines general requirements such as branding, moisture and other strength characteristics affecting grade; that the grading method be qualified in accordance with Part 2; and that the nominated properties have been verified in accordance with AS/NZS 4490 – 2011². Part 2 details the qualification of systems used to verify properties of timber. Historically the local industry has used machine stress graders based on low point contact grading (e.g. Metriguard) as the qualified system with the resultant product branded as MGP (machine grade pine).

Whilst not common, internal structural framing timber can also be visually graded to AS/NZ2858-2008 to meet design properties specified in AS1720. AS/NZS2858 is most commonly used today for non-load bearing internal studs and as a basis for an additional visual override on external structural products requiring a tighter visual appearance, such as F7 OPG H3³ outdoor treated pine. With the emphasis on grade compliance and verification, local manufacturers commonly supply the outdoor market with machine stress graded product that is also the subject of a visual override.

The industry manufactures the following grades: MGP10, MGP12, MGP15. The timber is available in a range of sizes from 70x35mm to 190x35mm, and in lengths commonly ranging from 2.4 to 6.0 metres.

The locally-produced structural timber is also available in a treated forms (designated with a "H" e.g. "H2") to protect against termite attack. The active ingredients or repellents in the treatment process include products such as *permethrin* and *bifenthrin*. Treated structural timber is available from the Australian industry in the same grades, sizes and lengths as non-treated structural timber.

Refer to CHHWPA, Hyne and Gunns Non-Confidential Attachments A-3.3 for information on like goods manufactured by the Australian industry.

 Describe the ways in which the essential characteristics of the imported goods are alike to the goods produced by the Australian industry.

The imported structural timber has the same essential characteristics as locally manufactured structural timber. Imported and locally produced structural timber are:

- classified to the same tariff sub-headings;
- made from similar raw materials;
- manufactured using similar manufacturing processes and techniques;
- sold into and compete in the same market segments and distribution channels:
- are interchangeable in identified end-use applications; and
- are priced to compete directly with each other.

For the above reasons the applicant industry considers that the imported goods possess the essential characteristics that are similar to the locally-produced structural timber.

The applicant industry would highlight that it is uncertain whether the imported goods are manufactured in accordance with AS1748 in all instances. Whilst it may be assumed that the imported timber is AS1748 compliant, there can be no certainty that this is the case.

What is the Australian and New Zealand Standard Industrial Classification Code (ANZSIC)
applicable to your product.

The ANZSIC code applicable to structural timber is understood to be 2323 "Wooden Structural Component Manufacturing".

² AS/NZS 4490 – 2011 details the general principles for verification of the properties of sawn structural grade timber applying at time of grading using any method of grading. It presents a range of specific methods that can be selected by manufacturers of structural sawn times.

can be selected by manufacturers of structural sawn timber.

³ OPG – Outdoor Premium Grade; H3 – Hazard class governing use of timber in outside, above ground applications.

6. Provide a summary and a diagram of your production process.

> A diagram of the structural timber manufacturing process is included at Hyne Confidential Attachment A-3.6 and is considered representative of the manufacturing process undertaken by each of the applicant companies.

> Briefly, timber is harvested and graded to permit log optimisation. Following sawing of timber according to size, the timber is transferred to a kiln drying process, thereafter dressing and grading takes place. Untreated timber is then passed to warehouse or direct delivery to customer. Treated timber is subjected to the termite treatment process and thereafter is transferred to warehouse or direct to customer.

- 7. If your product is manufactured from both Australian and imported inputs:
 - describe the use of the imported inputs; and
 - identify that at least one substantial process of manufacture occurs in Australia (for example by reference to the value added, complexity of process, or investment in capital).

Structural timber manufactured by the applicant companies is 100 per cent manufactured from Australian softwood timber.

8. If your product is a processed agricultural good, you may need to complete Part C.3 (close processed agricultural goods).

The goods the subject of this application are not considered to be "close processed agricultural goods".

9. Supply a list of the names and contact details of all other Australian producers of the product.

Other Australian manufacturers of structural timber are as follows:

- Boral Timber 89 St Hillers Road Auburn NSW 2144 Tel: (02) 9735 5500 Fax: (02) 9737 8084
- 2. AKD Softwoods 7-15 Forrest Street Colac Victoria 3250 Tel: (03) 5231 9111 Fax: (03) 5231 1921
- 3. Allied Timber Products 770 Old Gympie Road Burpengary QLD 4505 Tel: (07) 3888 0125 Fax: (07) 3888 0093
- 4. Wespine Industries Suite 12, 477 Orrong Road Welshpool W.A. 6106 Tel: 1300 414 044
- 5. D and R Henderson 106 Ham Street (P.O. Box 199) Windsor NSW 2756 Tel: (02) 4577 4033 Fax: (02) 4577 4759

A-4 The Australian market.

1. Describe the end uses of both your product and the imported goods.

The Australian market for structurally graded timber is in the manufacture of frame and trusses and stick-built framing construction throughout Australia for housing, other dwelling, alterations and additions, commercial and industrial buildings.

- Generally describe the Australian market for the Australian and imported product and the conditions of competition within the overall market. Your description could include information about:
 - · sources of product demand;
 - marketing and distribution arrangements;
 - · typical customers/users/consumers of the product;
 - · the presence of market segmentation, such as geographic or product segmentation;
 - causes of demand variability, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production;
 - . the way in which the imported and Australian product compete; and
 - · any other factors influencing the market.

The Australian structural timber market is currently estimated at approximately 1.7 million m³ per annum.

Sources of product demand

The main source for demand of structural sawn timber products within Australia is residential detached housing activity (i.e. building). As a lead indicator, housing approvals are recorded at local council level and published by the Australian Bureau of Statistics ("ABS"). This monthly published number helps to determine the level of housing demand state-by-state and nationally (approximately lagged by three months).

The best representation of sawn timber demand comes from the number of monthly detached housing approvals which are currently sitting at an annualised 9,501 approvals per month (February 2010 to February 2011). Figure 1 shows the number of approvals in each of the sectors and Figure 2 tracks the number of approvals that translate into commencements.

On the demand side, the building industry accounts for approximately 70 per cent of total sawn timber usage and the industry is subject to the cyclical fluctuations of housing construction. The building cycle follows a long-term underlying trend, and often runs counter to government and central bank economic management policies such as interest rates and taxes (Source: BIS Shrapnel, Sawn Timber). Further analysis of the factors affecting the market follows.

Figure 1 - Housing Approvals January 1999 to January 2011

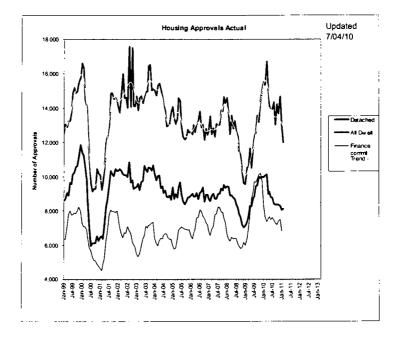
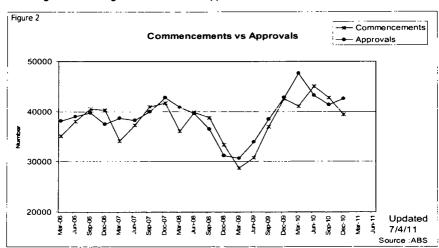


Figure 2 - Housing Commencements v Approvals



The key building markets in Australia are located in mainland capital cities. In these markets, imported structural timber is filtering through at increasing volumes, displacing local supply. The Australian market has historically been supplied from Australian producers and to a small extent import agents (i.e. importers). Australian producers predominantly sell their structural framing timber directly to timber merchants and frame and truss companies who in turn sell to builders who carry out the house construction. Some Australian producers sell a proportion of their product through wholesaling companies who then on-sell to timber merchants and frame and truss companies.

In terms of import agents, these companies have typically sourced structural pine from a range of companies mainly in New Zealand, USA and Europe. The import agents sell in the same market segments as local timber companies.

In recent times, importers with direct affiliations with overseas suppliers source their own products and have established their own distribution chain, selling directly into the same markets as the Australian producers. This change in direction by some companies has resulted in the importer investing in infrastructure (mainly warehousing) in most mainland states and has seen a need for them to dramatically grow market share. Considerable pressure has thereby been applied to the Australian industry's selling prices as large importers seek to increase turnover. The imported products compete directly with Australian-produced structural timber, with price being the differentiating factor.

typical customers/users/consumers of the product

Both the imported and locally made structural timber share the same customers, users and consumers. The route to market is also the same – via timber wholesalers, merchants, resellers and frame and truss manufacturers.

Figure 3 - Typical sales channel to market for Australian industry

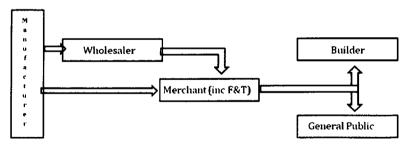


Figure 3 depicts the typical market channel for the Australian manufacturer of structural timber that involves either supply to market via a wholesaler to a timber merchant or frame and truss manufacturer, or direct from the manufacturer to a timber merchant or frame and truss manufacturer, then onto builders and/or consumers (end-users in both instances).



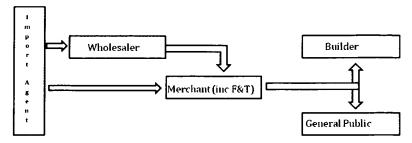


Figure 4 depicts the route to market for importers. It is understood that the largest importer Stora Enso imports and supplies via a combination of timber wholesalers, merchants, and frame and truss manufacturers, with other importers supplying via timber merchants, and frame and truss manufacturers in order to reach end-users.

The end users of the structural timber include the professional industry (i.e. the building industry and the general public). Builders typically use timber for house construction irrespective of being pre-fabricated into wall frames or roof trusses, or on-site for stick-built construction. Builders purchase structural timber from merchants and frame and truss manufacturers. The general public commonly use timber in a range of less elaborate D.I.Y applications, having first purchased the structural timber from a merchant.

The ultimate consumers of the structural timber are effectively home and building owners, whether individuals or corporate entities.

Timber used by builders in detached houses.

Figure 5 depicts the type of material used nationally in each of the main building applications for detached houses as a percentage of total volume of material used. The Table also includes forecasts to 2020 (Source: BIS Shrapnel, Sawn Timber). It is evident that softwood structural timber is the predominant raw material choice in each end-use identified.

Figure 5 – Timber and other materials usage by builders of detached houses, by application, Australia 2007, in percentage terms.

Roof Frame									
	2006	2007	2008	2009	2010	2011	2012	2013-17	2018-22
Softwood	87	89	89	89	89	89	89	89	90
Hardwood	8	6	6	6	7	6	6	6	6
LVL	1	2	1	1	1	1	1	1	0
Steel	4	4	4	3	3	3	3	4	4
External Wall Frame									
Softwood	79	78	79	80	80	80	80	79	79
Hardwood	1	1	1	1	1	1	1	1	1
Brick	11	11	11	10	10	10	11	11	11
Steel	9	9	9	9	8	8	9	10	10
Internal Wall Frame									
Softwood	75	75	75	77	77	77	76	76	76
Hardwood	1	1	1	1	1	1	1	1	1
Brick	15	15	15	14	14	14	14	14	14
Steel	9	9	9	8	8	8	9	9	10
Flooring bearers									
& joists									
Softwood	45	45	44	45	46	46	47	45	45
Hardwood	24	24	· 23	23	23	22	22	21	22
LVL	14	15	15	15	15	15	15	16	16
Steel	16	17	17	17	15	16	16	17	17

Source: BIS Shrapnel, Sawn Timber.

economic factors affecting building demand

The cyclical and long-run components of building activity are influenced by economic factors. Over the longer-term, factors of influence include real income levels, population growth, the level of unemployment, and the rate of growth in the economy, all impacting the underlying demand for dwellings and non-dwelling buildings (the latter includes retail facilities, hospitals, schools, leisure facilities, office buildings, factories warehouses, and parking buildings).

In the short term, the most significant influences on the building cycle are interest rates and housing affordability. The level of housing interest rates and affordability has an effect on dwellings, because it influences the size of the mortgage that can be serviced by a given income. Interest rates and rental returns also affect investment in non-dwelling buildings.

In addition, financial incentives and government duties and charges on property transactions can influence the returns from the investment in new and established buildings. There have been some substantial incentives targeted at first home buyers in recent years, and the 2010 round of state government budgets featured further initiatives to improve housing affordability for first home buyers. (Source: BIS Shrapnel - Building in Australia 2010 -2025)

There is also a seasonality aspect to the building industry with weather influencing building timeframes and demand (e.g. recovery from natural disasters). In periods of extreme or poor weather conditions there is a direct impact on the level of approved building plans translating into commencements given the time needed for slabs to dry, particularly with detached dwellings. Over the December and January period builders' holidays and the number of working days also affect the level of construction that commences/progresses.

Technological and timber resource factors within the sawn timber industry influence the production volumes of sawn timber. Local producers continue to advance technology to enhance product and after-treatments to further value add the structural pine resource. There is, however, competition at a technological level with the development of substitute products like laminated and finger-jointed products in the market.

Incremental improvements in processing technology have contributed to mills' continuous improvement programs at local mills. However the marginal improvement is essentially small as



there is a limit to the product volume and grade yield shift possible from each log based upon available technology. Currently these marginal improvements are estimated to offer approximately a 0.5% increase in volume yield into MGP and F grades per annum in modern mills. Significant step changes in product yields due to improvement in processing technology are very unlikely.

Examples of technological improvements currently available, or expected to be available soon, include multiple-sensor non-contact grading (taking the place of "stress grader" and "visual override grading" in section A-3.6); non-destructive measurement systems for measuring log quality (for example fibre stiffness and defect patterns within logs) to enable better cutting decisions; and systems to better enable prediction of board final grade in the sawmill rather than after drying and planing. Such systems are at the cutting edge of international technology and are often customised or developed by timber producers in partnership with equipment suppliers.

· the way in which the imported and Australian product compete;

The local and imported products compete directly through the same channels to market with the same key reseller, re-manufacturer, timber merchant, wholesales, distributor customers all reaching the same end user markets. The structural timber market has a high level of price transparency and, combined with increasing import volumes, purchasing decisions are primarily based on price.

This is a commodity product and therefore generic in its product attributes and specifications including grades and sectional sizes.

It is understood imported products are sold into the Australian market place as being compliant to the relevant structural standards through both the Building Commission of Australia and the Australian Standards quidelines.

Identify if there are any commercially significant market substitutes for the Australian and imported product.

The main competition within the structural category is steel – refer Figure 5. There is some competition with light gauge steel framing used with pre-cast concrete panels.

There are also some instances in larger span and load bearing construction where structural solid and laminated hardwoods compete against the properties of structural softwood.

In WA, the market is dominated by double brick construction that is a commercially significant structural substitute for structural softwood wall framing.

In the building industry, substitute products include steel, aluminium, laminated veneer lumber, I-beams, reconstituted wood based panels (particleboard, medium density fibreboard); oriented strand board (OSB), oriented strand lumber (OSL), concrete and plastics compete strongly for markets traditionally supplied by sawn timber. Changes to building regulations favouring these products have impacted sawn timber consumption. (Source: BIS Shrapnel, Sawn Timber).

Complete <u>appendix A1</u> (Australian production). This data is used to support your declaration at the beginning of this application.

Australian Industry Confidential Appendix A1 has been completed on behalf of the applicant companies. Market estimates have been included for Australian manufacturers of structural timber that are not co-applicants to this application.

5. Complete appendix A2 (Australian market).

Australian Industry Confidential Appendix A2 has been completed on behalf of the applicant companies for the period 1 July 2007 to 30 June 2011 (with the exception of Gunns where data

is to 31 March 2011, with the April to June 2011 pro-rated based on nine months data to 31 March 2011). ABS import data has been used as the basis for determining estimates of sales of imported structural timber sold in Australia as imported from the countries nominated in this application. Similarly, ABS import data has been used to estimate sales volumes of structural timber from "other" exporting countries.

6. Use the data from appendix A2 (Australian market) to complete this table:

Indexed table of sales quantities*

Period	(a) Your Sales	(b) Other Aust ⁿ Sales	(c) Total Aust ⁿ Sales (a+b)	(d) Dumped Imports	(e) Other Imports	(f) Total Imports (d+e)	(g) Total Market (c+f)
2007/08	100	100	100	100	100	100	100
2008/09	90.9	100	93.6	89.7	74.8	81.9	90.5
2009/10	99.6	100	99.7	122.4	79.9	100.3	99.9
2010/11	82.0	100	87.3	132.6	84.0	107.4	92.6

Notes:

- Australian industry sales include sales for CHHWPA, Gunns and Hyne. Gunns sales data not available for April to June 2011 quarter, with sales data pro-rated for the quarter.
- Other industry sales include Boral, Wespine, Allied Timber Products, AKD Softwood and D and R Hendersons.
- Other Australian sales are based upon estimates. In the absence of knowledge of sales volumes of other Australian industry members, quantities have been estimated as stable across periods identified.
- Dumped imports includes imports sourced from Austria, Canada, Czech Republic, Estonia, Germany, Lithuania, Sweden and USA.
- 5. Other imports include imports from New Zealand.

A-5 Applicant's sales.

1. Complete appendix A3 (sales turnover).

Australian Industry Confidential Appendix A3 has been completed on behalf of the applicant companies. In addition, please refer to individual company Confidential Appendix A3 for detailed information. Please note, Gunns Appendix A3 data has been completed to 31 March 2011 only.

2. Use the data from appendix A3 (sales turnover) to complete these tables.

Indexed table of Applicant's sales quantities*

Quantity	2007/08	2008/09	2009/10	2010/11
All products				
Australian market	100	n/a	n/a	n/a
Export market	100	n/a	n/a	n/a
Total	100	n/a	n/a	n/a
Like goods				
Australian market	100	90.9	99.6	82.0
Export market	100	n/a	n/a	n/a
Total	100	90.9	99.6	82.0_

Notes:

- There are negligible exports of structural timber by the applicant companies (Gunns exported minor quantities in each of 2007/08 and 2008/09).
- The applicants' sales quantity for all products has not been included as two of three applicant companies are private companies and this information is commercially-sensitive. In addition, the



sales quantities are not consistently measured across all business units within each applicant company.

Indexed table of Applicant's sales values*

Values	2007/08	2008/09	2009/10	2010/11ytd
All products				
Australian market	100	n/a	n/a	n/a
Export market	100	n/a	n/a	n/a
Total	100	n/a	n/a	n/a
Like goods		 		
Australian market	100	97.2	102.8	85.2
Export market	100	n/a	n/a	n/a
Total	100	97.2	102.8	85.2

Notes:

- There are negligible exports of structural timber by the applicant companies (Gunns exported minor quantities in each of 2007/08 and 2008/09).
- The applicants' sales quantity for all products has not been included as two of three applicant companies are private companies and this information is commercially-sensitive.

3. Complete appendix A5 (sales of other production) if you have made any:

- internal transfers; or
- domestic sales of like goods that you have not produced, for example if you have imported the product or on-sold purchases from another Australian manufacturer.

The applicant companies have individually completed Confidential Appendix A5 for sales of purchasers made from other Australian producers and/or transfer sales. Please refer to company Confidential Appendix A5 schedules for each company.

4. Complete appendix A4 (domestic sales).

CHHWPA and Hyne have each completed Confidential Appendix A4 for all domestic sales of structural timber sold in Australia from 1 July 2010 to 30 June 2011. Gunns has completed Appendix A4 sales for period 1 April 2010 to 31 March 2011. This information has been provided on CD due to the significant volume of transactions.

5. If any of the customers listed at <u>appendix A4</u> (domestic sales) are associated with your business, provide details of the association. Describe the price effect of the association.

Some sales of the goods under consideration by the respective applicant companies are to related parties. Related party sales are identified in the respective Company Confidential Appendix A5 schedules. The applicant companies do not consider that the selling prices to related parties are influenced by the relationship.

6. Attach a copy of distributor or agency agreements/contracts.

The applicant companies will provide Customs and Border Protection with details of any distributor or agency agreements during verification visits.

7. Provide copies of any price lists.

The applicant companies do utilise price lists, however prices are determined on an import competing basis. Please refer to Confidential Attachment A-5.7 for copies of recent price lists for Hyne and CHHWPA.

- If any price reductions (for example commissions, discounts, rebates, allowances and credit notes) have been made on your Australian sales of like goods provide a description and explain the terms and conditions that must be met by the customer to qualify.
 - Where the reduction is not identified on the sales invoice, explain how you calculated the amounts shown in appendix A4 (domestic sales).
 - If you have issued credit notes (directly or indirectly) provide details if the credited amount has not been reported appendix A4 (domestic sales) as a discount or rebate.

Rebates or reductions used from time to time are included in the respective company Confidential Appendix A4.

9. Select two domestic sales in each quarter of the data supplied in <u>appendix A4</u> (domestic sales). Provide a complete set of commercial documentation for these sales. Include, for example, purchase order, order acceptance, commercial involce, discounts or rebates applicable, credit/debit notes, long or short term contract of sale, inland freight contract, and bank documentation showing proof of payment.

CHHWPA, Gunns and Hyne have each selected two domestic customers in each of the four quarters for which Confidential Appendix A4 data has been provided and included commercial documentation for each of the two quarterly sales selected. Please refer to Confidential Attachment A-5.9 for each company's commercial sales documentation.

A-6 General accounting/administration information.

Specify your accounting period.

Gunns and Hyne operate a July to June financial year. CHHWPA operates a January to December financial year.

2. Provide details of the address(es) where your financial records are held.

The financial records of the applicant companies are held at the offices identified in Section A-2 above.

- To the extent relevant to the application, please provide the following financial documents for the two most recently completed financial years plus any subsequent statements:
 - chart of accounts:

Charts of Accounts for each company have been provided on CD.

 audited consolidated and unconsolidated financial statements (including all footnotes and the auditor's opinion);

The financial records of each of the applicant companies are audited. CHHWPA and Hyne' audited statements will be made available to Customs and Border Protection at the time of verification visits. Gunns' timber accounts are audited and included in the Gunns' consolidated financial statements. Gunns' audited statements will also be made available to Customs and Border Protection at the time of the verification visit.

 internal financial statements, income statements (profit and loss reports), or management accounts, that are prepared and maintained in the normal course of business for the goods.

These documents should relate to:

 the division or section/s of your business responsible for the production and sale of the goods covered by the application, and

2. the company overall.

Please refer to Confidential Attachment A-6.3 for each company's internal financial reports (certain months).

If your accounts are not audited, provide the unaudited financial statements for the two
most recently completed financial years, together with your taxation returns. Any
subsequent monthly, quarterly or half yearly statements should also be provided.

The accounts of each of the applicant companies are audited.

 If your accounting practices, or aspects of your practices, differ from Australian generally accepted accounting principles, provide details.

The accounting practices of the applicant companies do not differ from Australia generally accepted accounting principles.

6. Describe your accounting methodology, where applicable, for:

This section has been completed separately for CHHWPA and Hyne – please refer to Confidential Attachment A-6.6 for each of the applicant companies. Gunns Limited accounting methodologies and policies are detailed in the company's 2010 annual report.

 If the accounting methods used by your company have changed over the period covered by your application please provide an explanation of the changes, the date of change, and the reasons.

The accounting policies adopted by the applicant companies have not altered over the periods covered by the application.

A-7 Cost information

 Complete <u>appendices A6.1</u> and <u>A6.2</u> (cost to make and sell) for domestic and export sales.

CHHWPA, Gunns and Hyne have each completed Confidential Appendices A6.1. The industry does not export the goods (other than minor volumes by Gunns in 2007/08 and 2008/09) that are the subject of this application and hence Confidential Appendices A6.2 have not been completed.

A-8 Injury

Estimate the date when the material injury from dumped imports commenced.

Material injury from the dumped imports of structural timber commenced in the 2009/10 year.

 Using the data from <u>appendix A6</u> (cost to make and sell), complete the following tables for each model and grade of your production.

Index of production variations (cubic metres)

Period	2007/08	2008/09	2009/10	2010/11
Index	100	79.34	91.65	76.82

Note:

1. Index of production based upon production of untreated and treated (i.e. H2) structural timber.

The aggregate production volume of the three largest structural timber manufacturers has declined since 2007/08, as imports from the countries nominated in this application have increased. The decline in production in 2008/09 was in part due to the impact of the global financial crisis.

Index of cost variations (A\$ per cubic metres)

Period	2007/08	2008/09	2009/10	2010/11
Index	100	110.92	119.33	121.84

Note:

1. Cost variation is based upon unit CTM&S data.

The Australian industry experienced increases in costs in 2008/09 and 2009/10, with a further increase in 2010/11. The cost increases are consistent with reduced production volumes and do not reflect the efforts of the applicant companies to reduce production costs to remain competitive with increasing import volumes.

Index of price variations (average price, all sizes untreated and untreated timber)

Period	2007/08	2008/09	2009/10	2010/11
Index	100	106.9	102.8	103.9

Note:

Price is based on unit selling price.

The Australian industry's selling prices declined in 2009/10 and stabilised in 2010/11. The decline in overall prices since 2008/09 reflects the competitive environment where competition from imports has increased and the Australian industry has been unable to raise prices to

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recover increased costs.

Index of profit variations (all sizes untreated and treated structural timber)

Period	2007/08	2008/09	2009/10	2010/11
Index	100	93.1	53.7	51.8

Note:

1. Profit variations based upon unit profit.

As the Australian industry members compete with increasing import volumes in 2009/10 and 2010/11, the member companies have been unable to increase prices in 2009/10 and 2010/11 to recover increases in costs experienced during 2009/10. As a consequence, there has been a substantial decline in industry profit in 2009/10 and 2010/11, with industry profit experiencing a decline of almost 40 per cent. In 2010/11, industry profit declined further, as the industry's margin was further eroded by increasing import volumes at dumped prices.

Index of Profitability variations (all sizes, untreated and treated structural timber)

Period	2007/08	2008/09	2009/10	2010/11
Index	100	87.1	52.2	49.8

Note:

1. Profitability is based upon unit profit as a percentage of unit sales revenue.

Consistent with the declining trend of unit profit, the industry's return on sales (i.e. profitability) has also declined in 2009/10 and further again in 2010/11.

Complete appendix A7 (other economic factors).

The Australian industry manufacturing structural timber is able to demonstrate a deterioration in certain other economic indicators including revenues, return on investment, ability to attract investment, employment numbers, and underutilised production capacity.

Index of Revenue variations (all sizes, untreated and treated structural timber)

Period	2007/08	2008/09	2009/10	2010/11
Index	100	97.2	102.8	85.2

Note:

1. Revenue variations based upon applicants' Appendix A6.1 data

The applicant companies have experienced erosions in revenues for structural timber in 2010/11. The decline in revenues is consistent with declines in sales volumes for the goods under consideration. Whereas the industry members were able to hold prices in 2009/10, this was not possible in 2010/11 against increased volumes of dumped imports.

Index of Return on Investment (all sizes, untreated and treated structural timber)

Period	2007/08	2008/09	2009/10	2010/11
Index	100	65.2	69.6	34.8

Note:

Return on Investment based upon data included in applicants' Appendix A7 schedules.

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The applicant industry has experienced reduced returns on investment as profit and profitability has been eroded due to an erosion of margin caused by dumped imports.

Index of Employment numbers (no. of employees in structural timber production & sales)

Period	2007/08	2008/09	2009/10	2010/11
Index	100	98.5	94.2	93.8

Note:

Employment numbers based upon data included in applicants' Appendix A7 schedules.

The Australian industry has sought to reduce costs associated with the production of structural timber. Employment numbers have been reduced across the industry, with further reduction announced in April and July 2011. The July 2011 announcement by Hyne involves a further 50 positions to be made redundant and are not included in the above index data.

Index of Stock Levels (cubic metres)

Period	2007/08	2008/09	2009/10	2010/11	
Index	100	115.2	108.1	203.8	

Note:

Based upon closing stock levels included in applicants' Appendix A7 schedules.

The Australian industry has experienced a substantial increase in inventory levels of structural timber as domestic sales and production levels have declined.

A-9 Link between injury and dumped imports.

To establish grounds to initiate an investigation there must be evidence of a relationship between the injury and the alleged dumping. This section provides for an applicant to analyse the data provided in the application to establish this link. It is not necessary that injury be shown for each economic indicator.

 Identify from the data at <u>appendix A2</u> (Australian market) the influence of the volume of dumped imports on your quarterly sales volume and market share.

In 2007/08 imports of structural timber from the eight nominated countries – Austria, Canada, Czech Republic, Estonia, Germany, Lithuania, Sweden and the United States – accounted for approximately 48 per cent of total annual imports into Australia. In each successive year thereafter, total imports from the eight countries have increased share as a percentage of total import volume. In 2010/11, the share held by the allegedly dumped imports had increased to 59.4 per cent.

The 2007/08 year is considered an appropriate benchmark for assessing the impact of the dumped imports on the Australian market, as market volumes were not impacted by extraneous factors. In 2008/09, the Australian market experienced a contraction due to the impact of the global financial crisis ("GFC") with imports and Australian industry sales contracting by similar percentages. However, in 2009/10, imports from the eight nominated countries increased to be 122 per cent of the levels of 2007/08, whereas the applicant industry's sales (represented by CHHWPA, Gunns and Hyne) had achieved only 97 per cent of the levels of 2007/08.

Imports of structural timber from other source countries (of which imports from New Zealand are a significant proportion) in 2009/10 recovered to be approximately 80 per cent of 2007/08 volumes.

In 2010/11, import volumes from the eight countries have continued to increase and exceed 2009/10 volumes by 8.3 per cent and are 33 per cent above 2007/08 levels. Meanwhile imports from other countries in 2010/11 are at approximately 84 per cent of 2007/08 levels. The applicant industry's sales are faring significantly worse, and are at approximately 82 per cent of the levels achieved in 2007/08.

The dumped imports from Austria, Canada, Czech Republic, Estonia, Germany, Lithuania, Sweden and the USA have experienced strong growth since 2008/09, significantly outperforming sales by the Australian industry of locally-produced structural timber. The Australian market data included at Confidential Appendix A2 evidences the loss of sales volume and market share of the Australian industry to the allegedly dumped imports.

The key indicators evident since 2007/08 can be summarized as follows:

- imports from the nominated countries in 2010/11 are 33 per cent above the levels of 2007/08;
- the allegedly dumped imports increased in volume by more than 8 per cent in 2010/11 over 2009/10;
- imports from "other" source countries in 2010/11 were at 84 per cent of the levels of 2007/08;
- the Australian industry's sales in 2010/11 are at approximately 82 per cent of the level of 2007/08, having declined by approximately 12 per cent on 2009/10 sales volumes; and
- it is evident that the allegedly dumped imports have displaced sales volumes and market share of local Australian sales of structural timber in 2009/10 and 2010/11.

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⁴ The applicant companies – CHHWPA, Gunns and Hyne account for more than 70 per cent of local industry sales of structural timber) and for the purposes of this application are considered representative of the Australian industry.

 Use the data at appendix A2 (Australian market) to show the influence of the price of dumped imports on your quarterly prices, profits and profitability provided at appendix A6.1 (costs to make and sell). If appropriate, refer to any price undercutting and price depression evident in the market.

Against a background of significantly increasing import volumes of structural timber at dumped prices, the performance of the applicant companies since 2008/09 has deteriorated. In 2009/10 when imports from the nominated countries expanded by more than 36 per cent over the previous year (applicant companies' sales increased by a mere 6 per cent), the applicant companies' profits deteriorated by almost 50 per cent. Unit profit diminished by approximately 40 per cent over the same period.

The applicant companies' selling prices have been undercut by the selling prices of the allegedly dumped imports in 2009/10, continuing into 2010/11. Xxxxx has documented competitive offers for imported structural timber for 2010 and 2011 (please refer to Confidential Attachment B-9.2(i)) contrasting import selling prices against local industry selling prices. The price undercutting from the dumped imports has caused a reduction in the Australian industry's selling prices in 2009/10 (from the previous period) by an average four percent, and it is anticipated that 2010/11 average prices will be lower than 2009/10 prices (once full account of the April to June 2011 quarter is included).

Supporting documents evidencing price quotations for imported structural timber have also been included at Confidential Attachment B-9.2(ii).

In addition to the detailed information concerning competitive offers for imported structural timber, an analysis has been undertaken of the price undercutting evident of one Australian industry member's selling prices versus an importer's selling price for the highest volume structural timber (90 x35 and 45) in the Victorian market. Please refer to Confidential Attachment B-9.2(iii) for graphic representation of price undercutting of an Australian manufacturer's selling prices by an importer of the goods the subject of this application, with price undercutting generally within the range of 4 to 10 per cent over the period February 2009 to June 2011.

It is evident that the impact of rapidly increasing import volumes of structural timber at dumped prices from the eight nominated countries have undercut the selling prices of the Australian industry and have contributed to an erosion of the industry's selling price over costs, culminating in marked reductions in profits and profitability. The evidence from the marketplace suggests that import volumes from the nominated countries are continuing to grow and that selling prices are being further undercut by the dumped imports.

 Compare the data at <u>appendix A2</u> (Australian market) to identify the influence of dumped imports on your quarterly costs to make and sell at <u>appendix A6.1</u> (for example refer to changes in unit fixed costs or the ability to raise prices in response to material cost increases).

Whereas the applicant companies' selling prices have deteriorated since 2008/09, the industry's cost-to-make-and-sell ("CTM&S") has increased by approximately 8 per cent since 2008/09 (and almost 20 per cent since 2007/08). The inability of the Australian industry to raise prices and recover cost increases has contributed to an erosion of the industry's margin, resulting in a diminution of industry's profits and profitability. Further price reductions are evident in the April to June 2011 quarter, with higher unit CTM&S occurring due to reduced production volumes.

The Australian industry is unable to increase prices to recover higher costs of production evident in 2009/10 and 2010/11 as it competes with the aggressively-priced dumped imports. The competitive offers documented at Confidential Attachment B-9.2 reflect the declining trend in import prices thereby preventing the applicant industry from raising prices.

4. The quantity and prices of dumped imported goods may affect various economic factors relevant to an Australian industry. These include, amongst other things, the return on investment in an industry, cash flow, the number of persons employed and their wages, the ability to raise capital, and the level of investment in the industry. Describe, as appropriate, the effect of dumped imports on these factors and where applicable use

references to the data you have provided at <u>appendix A7</u> (other economic factors). If factors other than those listed at <u>appendix A7</u> (other economic factors) are relevant, include discussion of those in response to this question.

The financial impact of the allegedly dumped imports on the Australian industry is experienced beyond the primary economic indicators of sales volumes, market share, selling prices, profit and profitability. In particular, the decline in profit and profitability impacts the applicant companies' returns on investment and the ability of the industry to re-invest in the production assets of the goods under consideration ("GUC").

The Australian industry has reduced the number of employees that are involved in the production and sales of structural timber since 2007/08. As at 30 June 2010, the number of employees in the industry had been reduced by 8 per cent. Subsequent to 31 March 2011, Hyne has announced two separate redundancy decisions – one in April 2011 and a further in July 2011. It is evident that increasing import volumes at dumped prices and the subsequent impacts on profit and profitability have contributed to reductions in employment levels as industry members seek to reduce costs to compete with the dumped imports.

As the industry's margin is eroded the Australian producer's have sought to reduce costs. This has resulted in reductions in employee numbers in the first instance.

The applicant companies can demonstrate deteriorations in each of the following economic indicators that (in the applicants' view) can be attributed to the increasing volumes of dumped imports, namely:

- reduced return on investment;
- reduced attractiveness to reinvest;
- reduced investment in the industry;
 - reduced employment; and
- underutilisation of capacity.
- Describe how the injury factors caused by dumping and suffered by the Australian industry are considered to be 'material'.

The applicant companies have experienced a reduction in profit of almost 50 per cent over the last two years (i.e. 2009/10 and 2010/11). The applicant industry's sales volumes of structural timber in 2010/11 are approximately 83 per cent of the levels of 2007/08. By contrast, the dumped imports have increased by 33 per cent over the same period.

The erosion of the industry's sales volumes, market share, profit and profitability are individually significant and cannot be considered 'immaterial or insubstantial'.

The Australian industry's selling prices are continuing to experience price undercutting from the dumped imports – imposing further pressures on industry margins as unit costs have increased.

The identified injurious indicators are evidence that the impact of the dumped imports on the Australian industry is 'material'. Contrasted against 2007/08, the Australian industry's performance is at substantially reduced levels – in terms of sales volumes, operating margins and profit and profitability. The applicant industry considers that the injury experienced as a consequence of the dumped imports is significant and material, contributing to lost profit and profitability, reductions in employment levels, and reduced returns on investment.

6. Discuss factors other than dumped imports that may have caused injury to the industry. This may be relevant to the application in that an industry weakened by other events may be more susceptible to injury from dumping.

The impact of the GFC in 2008/09 is observable in 'Confidential Attachment A2 – Australian Market' with the decline in import volumes and Australian industry sales by comparable percentages. In subsequent periods (2009/10 and 2010/11) imports from the nominated countries increased by 36 per cent and 8 per cent in consecutive years, whereas the Australian industry's sales increased by only 4 per cent, and subsequently decreased to be 17 per cent

below the levels of 2007/08.

The Australian market appears to have contracted by approximately 7 per cent in 2010/11.

It is evident from the increasing trends in import volumes from the nominated countries and the contrasting reduction in the Australian industry's sales that the allegedly dumped imports have secured increased sales and market share that have previously been held by the Australian industry – in a declining market. The Australian industry's reduced sales volumes have negatively impacted on local production volumes and have similarly resulted in increased unit costs of production. The industry is cognisant of the small contraction in the size of the Australian market; however, the increasing import volumes at substantial margins of dumping have been the major cause of material injury experienced by the industry.

7. This question is not mandatory, but may support your application. Where trends are evident in your estimate of the volume and prices of dumped imports, forecast their impact on your industry's economic condition. Use the data at appendix A2 (Australian market), appendix A6 (cost to make and sell), and appendix A7 (other economic factors) to support your analysis.

The Australian structural timber industry has come under increasing competition following the end of the global financial crisis. Whereas it was anticipated that the industry would recover to pre-GFC levels, the recovery was brief, followed by a further deterioration – to levels that are now less than in the 2008/09 year that coincided with the GFC.

As economies across Europe and North America have stagnated following the GFC, domestic manufacturers in countries where domestic demand has evaporated have turned to export markets to place production. By contrast with European and North American economies, the Australian market experienced growth in 2009/10 and 2010/11. Structural timber manufacturers in each of the countries nominated in this application have maintained or increased export volumes of the GUC to Australia following the GFC. Imports of the GUC from the eight exporting countries have grown by 20 per cent since 2007/08 – whereas the Australian industry's sales volumes have contracted by almost 18 per cent. The loss of sales volumes and market share of the Australian industry can be attributed to the price undercutting of the dumped imports, contributing to an erosion of the industry's margin resulting in lost profits and profitability.

The deterioration of the industry's performance has also translated to the secondary economic indicators, including reduced returns on investment, the inability to attract capital for reinvestment, reduced production utilisation rates, and reduced employment. One Australian industry member has signalled its intention to exit the industry.

The applicants consider that anti-dumping measures are necessary to address the injurious impacts of the dumping. Section B-6 below details the significant dumping margins evident from the exporting countries (margins ranging from 8 to 127 per cent, with the majority above 40 per cent). The substantial dumping margins evident have translated into significant deteriorations in the Australian industry's performance as evidenced through the price and volume performance indicators. Anti-dumping measures are urgently required to limit any further material injury from dumping.

In the absence of dumping measures it is the industry's view that further plant closures (of structural timber facilities) are imminent and foreseeable. The dramatic increase in aggregate import volumes from the eight identified countries since the GFC raises significant concerns about the long-term viability of local production of structural timber.

The Australian structural timber industry therefore requests the Chief Executive Officer of Customs and Border Protection to commence an investigation into the allegations of dumping, material injury and causal link detailed in this application. Further, the applicants request that provisional measures be imposed at the earliest opportunity following Day 60⁵ of a formal investigation.

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⁵ In accordance with Article 7.3 of the WTO Anti-Dumping Agreement.

PART B

DUMPING

IMPORTANT

All questions in Part B should be answered even if the answer is 'Not applicable' or 'None' (unless the application is for countervailing duty only: refer Part C). If an Australian industry comprises more than one company/entity, Part B need only be completed once.

For advice about completing this part please contact the Customs Dumping Liaison Unit on:

2 (02) 6275-6066 Fax (02) 6275-6990

B-1 Source of exports.

Identify the country(ies) of export of the dumped goods.

The countries of export of the dumped goods identified at Section A-3 above include Austria, Canada, the Czech Republic, Estonia, Germany, Lithuania, Sweden and the USA.

Identify whether each country is also the country of origin of the imported goods. If not, provide details.

It is the applicants' understanding that the country of export for the goods the subject of this application is also the country of origin of the goods.

3. If the source of the exports is a non market economy, or an 'economy in transition' refer to Part C.4 and Part C.5 of the application.

The source countries for the exports of structural timber identified in this application are not considered – for the purposes of Australia's Anti-Dumping provisions – non-market economies or economies in transition countries.

- 4. Where possible, provide the names, addresses and contact details of:
 - · producers of the goods exported to Australia;

The producers of the goods the subject of this application are understood to be as follows:

(i) StoraEnso is a global forest products business. The company supplies products from "renewable, high quality European pine and spruce material". Timber products include sawn timber sourced from Nordic, Central European, Baltic and Russian mills. It is the applicant industry's understanding that StoraEnso is sourcing structural timber for supply to Australia from production facilities located in Austria, the Czech Republic, Estonia, Lithuania and Sweden.

StoráEnso has 22 lumber production facilities throughout 11 countries located in Europe (including Eastern Europe). Timber can be supplied from any one of the production facilities. It is the applicant industry's understanding (as reflected in the Australian Bureau of Statistics data) that StoraEnso Australia is sourcing product from its affiliated production facilities in Austria, the Czech Republic, Estonia, Lithuania and Sweden. In the event antidumping measures are applied to StoraEnso's exports from the identified countries it is likely that StoraEnso could supply structural timber from manufacturing facilities located in any one or more of the six other countries that it operates timber manufacturing facilities.

StoraEnso facilities located in each of the identified exporting countries are as follows:

Austria

StoraEnso operates four sawmills in Austria. The Ybbs mill has an annual sawn production capacity of approximately 590,000 m³ and includes a planing mill. It is understood that StoraEnso's exports to Australia from Austria are sourced from the Ybbs mill.

StoraEnso Timber Bahnhofstr. 31 AT-3370 YBBS Austria

Tel: 43 7412 530 33 4420 Fax: 43 7412 530 33 4490

Czech Republic

StoraEnso operates two sawmills in the Czech Republic. It is understood that StoraEnso could source structural timber for export to Australia from both facilities. Contact details are as follows:

StoraEnso Timber Zdirec Sawmill Nadrazni 65 ZDIREC N.D. Czech Republic Tel: 420 569 77 6600 Fax: 420 569 77 6690

Plana Sawmill Tachovska 824 CZ-348 15 Plana Tel: 420 374 707 700 Fax: 420 374 707 790

Estonia

StoraEnso operates two sawmills in Estonia, located at Imavere and Napi. The Imavere mill has been in operation since 1995 and employs 299 people. The Napi sawmill is located approximately 100km east of Tallinn and commenced operations in 1991. It employs approximately 145 people.

StoraEnso Timber Napi tee 10 RAKVERE Estonia Tel: 372 32 29 199

Fax: 372 32 29 190

StoraEnso Timber Imavere vaid JARVA MAAKOND Estonia

Tel: 372 38 49 301 Fax: 372 38 49 302

Lithuania

StoraEnso operated sawmill at Alytus that commenced production in 2003. The StoraEnso website page for the Lithuanian mill specifically identifies the supply of timber to the Australian market.

StoraEnso Lietuva Naujoji g. 134 LT-62175 ALYTUS Lithuania Tel: 370 315 56910

Fax: 370 315 56911

Sweden

StoraEnso operates three mills in Sweden. The applicants' understand that the goods exported to Australia by StoraEnso in Sweden are from StoraEnso's Gruvon mill, that has an annual capacity of approximately 420,000 cubic metres. Further, the applicants' understand that StoraEnso is closing one of its Swedish mills - the Kopparfors sawmill. The contact details for the mill are as follows:

StoraEnso Timber P.O. Box 24 SE-81721 NORRSUNDET Sweden Tel: 46 0 1046 399 00 Fax: 46 0 1046 399 78

StoraEnso's business contact in Sweden is:

SVARDSJOGATAN 8 SE-79180 FALUN Sweden Tel: 46 0 1046 800 00 Fax: 46 0 1046 827 75

(ii) Egger Holz GMBH is a manufacturer of undressed timber in Austria and Germany. The company has 16 manufacturing plants located in 7 countries. It is understood Egger Holz exports structural timber to Australia from Austria and/or Germany. Contact details are as follows:

Austria

Fritz Egger GmbH & co OG Holzwerkstoffe Weiberndorf 20 6380 St Johann in Tirol Austria Tel: 43 50 600 00000

Fax: 43 50 600 10111

Germany

Egger Sagewerk Brilon GMBH Im Kissen 19 59929 Brilon Germany Tel: 49 2961 770 230 Fax: 49 2961 770 630

(iii) Prior to 2010, exports of structural timber to Australia from Germany were via the Klausner Group. The Klausner Group operated two German sawmills.

In 2010, Ilim Timber purchased Klausner's two German sawmills. Ilim Timber is a Russian-owned company with operations in Russia and the USA. The company has offices in Europe and China. Ilim Timber has its own forest resource in Russia and longterm contracts with suppliers. Production is of northern softwood, Angara pine, Siberian larch, Bavarian spruce and southern yellow pine. The company's head office is in St Petersburg. Australia is identified as an export destination for Ilim Timber sales manufactured in Germany. Contact details are as follows:

Ilim Nordic Timber GmbH & Co KG Am Haffeld 2 Mecklenburg-Vorpommern

Federal Republic of Germany Tel: 49 3841 2540 Fax: 49 3841 2541-9

(iv) Sodra Timber operates 10 sawmills in Sweden with the largest in Langasjo. Contact details are as follows:

Sodra Timber Langasjo 361 95 Langasjo Sweden Tel: 46 471 509 00 Fax: 46 471 509 01

(v) Vaagen Bros Lumber operates a sawmill with a 210,000m³ annual capacity in Washington State, USA. The Australian importer has increased volumes in 2011 and it is likely further increases will follow due to Vaagen Bros Lumber re-opening of a previously closed sawmill at Midway, British Columbia (Canada), announced in early 2011.

Contact details for Vaagen Bros Lumber are as follows:

Vaagen Bros Lumber Co 565 W 5th Colville Washington State 99114 USA

· exporters to Australia; and

It is understood by the applicant industry that the exporters of the goods the subject of the application are also the producers of the goods (or affiliated companies thereof).

· importers in Australia.

The following companies are understood to be importers of the allegedly dumped structural timber.

(i) StoraEnso Australia Pty Ltd 2 Cyanamid Street Laverton North Victoria 3026 Tel: (03) 9360 3100 Fax: (03) 9360 3199

StoraEnso Australia Pty Ltd is the importer of structural timber exported by StoraEnso affiliated companies in Austria, Czech Republic, Estonia, Lithuania and Sweden.

(ii) Meyer Timber Pty Ltd 15 Dana Court Dandenong Victoria 3175 Tel: (03) 9791 1897

(iii) Le Messurier Timber Co Pty Ltd 82-94 Grand Trunk Way Port Adelaide S.A. 5015 Tel: (08) 8447 0400 Fax: (08) 8447 0440

Meyer Timber and Le Messurier are understood to be importing from Egger Holz of Germany (and possibly Austria).

(iv) Tilling Timber Pty Ltd 31-45 Orchard Street P.O. Box 189 Kilsyth Victoria 3137 Tel: (03) 9725 0222 Fax: (03) 9725 3045

Tiling is understood to import from Ilim in Germany.

(v) Victorian Timber Wholesalers

P.O. Box 164

Belmont Victoria 3216 Tel: (03) 5229 5550 Fax: (03) 5229 8299

Victorian Timber Wholesalers is a distributor of imported timber from Egger Holz.

(vi) Moxon and Company Pty Ltd 59 Blackbutt Circle

Mt Riverview NSW 2774

Tel: (02) 4739 2200

Moxon and Company imports structural timber from North America and Europe, and is understood to be the major importer from Canada and the USA for product supplied by Vaagen Bros Lumber, and Sodra from Sweden.

If the import volume from each nominated country at <u>Appendix A.2</u> (Australian Market)
does not exceed 3% of all imports of the product into Australia refer to Part C.6 of the
application.

In 2010/11 import volumes from the countries the subject of this application have been as follows (for the twelve months to June 2011):

Table B-1.5 - Import volumes from nominated countries (cubic metres)

Country	Import Volume in 2010/11 Cubic metres	As % of total Imports
Austria	39812	7.1 per cent
Canada	37991	6.7 per cent
Czech Republic	85056	15.1 per cent
Estonia	68965	12.2 per cent
Germany	45063	8.0 per cent
Lithuania	21582	3.8 per cent
Sweden	29308	5.2 per cent
USA	19768	3.5 per cent
Other Countries	217156	38.5 per cent
Total Imports	564701	100 per cent

Import volumes from each of the nominated countries exceed the 3 per cent negligible volume amounts during the 2010/11 year.

Please refer to Non-Confidential Attachment B-1.5 for a summary of import volumes of the goods the subject of this application. A soft copy form of data has also been provided with the application (is not for further distribution).

In the case of an application for countervailing measures against exports from a
developing country, if the import volume from each nominated country at <u>Appendix A.2</u>
(Australian Market) does not exceed 4% of all imports of the product into Australia refer to
Part C.6 of the application.

This application is for anti-dumping measures and therefore this question does not apply.

B-2 Export price

 Indicate the FOB export price(s) of the imported goods. Where there are different grades, levels of trade, models or types involved, an export price should be supplied for each.

The applicants have determined FOB prices for the GUC by the deductive export price method for exports of structural timber from Austria, Czech Republic, Estonia. Lithuania and Sweden. It is considered that export prices for the GUC consideration from these source countries are likely to have been influenced by the relationship between the exporter and its Australian affiliate (i.e. StoraEnso and StoraEnso Australia). The Australian Bureau of Statistics ("ABS") information, whilst reliable in terms of volumes imported into Australia, is not considered reliable for determining actual export prices in these circumstances.

For exports of the GUC originating from Canada, Germany and the USA, where the Australian importer(s) is(are) unrelated to the exporter, Australian Bureau of Statistics ("ABS") data has been relied upon as the basis for export prices. The published ABS import prices are sourced from the raw data included in Non-Confidential Attachment B-1.5.

The Australian industry is further concerned by declining selling prices in the marketplace that suggests that there may be reimbursements by exporters to importers to support recent increasing levels of export volumes.

2. Specify the terms and conditions of the sale, where known.

Deductive export price calculations for structural timber exported from Austria, Czech Republic, Estonia, Lithuania and Sweden have been determined at the ex-factory point in the country of export.

Export prices for goods exported from Canada, Germany and the USA are also understood to be at the ex-factory level, as the goods are believed to be containerized at factory for export.

3. If you consider published export prices are inadequate, or do not appropriately reflect actual prices, please calculate a deductive export price for the goods. <u>Appendix B1</u> (Deductive Export Price) can be used to assist your estimation.

As indicated above, the Australian industry considers that the published ABS import prices for the GUC from each of Austria, Czech Republic, Estonia, Lithuania and Sweden are not accurate due to the relationship between the exporter and the Australian importer.

Deductive export prices have therefore been determined for Austria, Czech Republic, Estonia, Lithuania and Sweden.

The applicants have determined deductive export prices from competitive offers for the allegedly dumped goods obtained from the marketplace. Confidential Attachment A-9.2(i) includes a summary of the import offers for the allegedly dumped imports documented for 2010 and 2011 upon which deductive export price calculations have been made.

As indicated above, the Australian industry considers that the published ABS import prices for the

The applicants have determined the deductive export price for the GUC by deducting from the competitive selling price the following:

importer profit;

warehousing:

- local delivery to customer (from warehouse);
- -
- an amount for selling and administration:
- local freight from wharf to warehouse;
- Customs Duty (where applicable);
- Overseas freight (from ABS CIF versus FOB values);
 - Local inland freight in country of export.

Please refer to Section 8-6.1 below for deductive export price calculations for exports from Austria, Czech Republic, Estonia, Lithuania and Sweden, by quarter to March 2011.

It is important that the application be supported by evidence to show how export price(s)
have been calculated or estimated. The evidence should identify the source(s) of data.

Please refer to industry calculations demonstrating basis for deductions and calculations at Confidential Attachment B-2.4 (included with constructed selling price information at Confidential Attachment B-4.1 – see below) for detailed supporting information evidencing deductive export price calculations for exports of the GUC from Austria, Czech Republic, Estonia, Lithuania and Sweden.

B-3 Selling price (normal value) in the exporter's domestic market.

 State the selling price for each grade, model or type of like goods sold by the exporter, or other sellers, on the domestic market of the country of export.

Domestic selling prices for structural timber sold in each of the countries the subject of this application are not available in industry newsletters or journals. In particular, domestic selling prices for structural timber sold in countries including Austria, Czech Republic, Estonia, Germany, Lithuania and Sweden are not readily available to interested parties that are not members of the domestic industries.

The Australian industry is aware that a significant proportion of structural timber production of European mills is exported thereby further limiting the likelihood of evidencing published domestic prices.

The Australian industry has therefore constructed selling prices for structural timber sold in each of the eight countries that are exporting the GUC to Australia. Constructed selling prices have been determined on the basis of independent information relating to raw material input costs and expert understanding of mill costs to produce sawn timber.

Please refer to Section B-4 for details concerning the basis for constructed selling prices used as the basis for *prima facie* normal values in this application.

2. Specify the terms and conditions of the sale, where known.

The constructed selling prices determined on a quarterly basis for each exporting country have been determined at the ex-factory level (i.e. not inclusive of local delivery to customer).

3. Provide supporting documentary evidence.

Please refer to Confidential Attachment B-4 for details of constructed selling price information for each of the nominated exporting countries identified in this application.

 List the names and contact details of other known sellers of like goods in the domestic market of the exporting country.

The Australian industry has identified the producers of the allegedly dumped exports of structural timber at Section B-1.4 above. In certain instances more than one domestic producer has been identified as exporting to Australia. The Australian industry anticipates that the identified

exporters will cooperate with inquiries conducted by the Australian Customs and Border Protection Service.

B-4 Estimate of normal value using another method.

 Indicate the normal value of the like goods in the country of export using another method (if applicable, use <u>appendix B2</u> Constructed Normal Value).

As indicated at Section B-3.1 above, the applicant industry has based *prima facie* normal values for the allegedly dumped exports of structural timber on the basis of constructed selling prices. The applicants have modelled sawmill production costs to take account of log purchased at prices considered arms length transactions. Sawmill log prices used are those applicable in 2010 and the first quarter of 2011. Sawmill log prices were not available for Lithuania, and the nearest available sawmill log price to producers in Lithuania has been used (i.e. Sweden). Sawmill costs are based upon an efficient Australian sawmill, adjusted for country labour and wage rates in the exporting country.

An allowance of 6 per cent profit has been applied based upon on Stora Enso's published profit and is considered the minimum level required for investors in the industry.

Constructed selling prices for each of the nominated countries: Austria, Canada, Czech Republic, Estonia, Germany, Lithuania, Sweden and the USA are included at Confidential Attachment B-4.1. All constructed selling price information is included in electronic form with the application.

2. Provide supporting documentary evidence.

Please refer to Confidential Attachment 8-4.1 for supporting information to constructed selling price information in each exporting country.

B-5 Adjustments.

 Provide details of any known differences between the export price and the normal value. Include supporting information, including the basis of estimates.

Constructed selling prices for the GUC in each of the exporting countries have been determined at the ex-factory level. Deductive export price calculations have also been determined at the exfactory level.

As the constructed selling prices for structural timber sold in the country of export are determined at the same level as deductive export price calculations, no adjustment to the *prima facie* normal values are required.

State the amount of adjustment required for each and apply the adjustments to the domestic prices to calculate normal values. Include supporting information, including the basis of estimates.

As no adjustments to constructed selling prices are required, this question is not applicable.

B-6 Dumping margin.

 Subtract the export price from the normal value for each grade, model or type of the goods (after adjusting for any differences affecting price comparability).

Prima facie dumping margins for structural timber exported to Australia from each of the nominated countries included in this application are summarized, on a quarterly basis, in Table B-6.1 below.

Table B-6.1 - Dumping Margin calculations - structural timber (A\$ per '000m³)

Country	Apr-Jun Qtr 2010	Jul-Sep Qtr 2010	Oct-Dec Qtr 2010	Jan-Mar Qtr 2011
Austria	1			
Construct Sell Price	\$416	\$430	\$428	\$418
Deduct Export Price	\$253	\$237	\$211	\$220
Dumping Margin	\$163	\$193	\$217	\$198
% of Export Price	64.4%	81.4%	102.8%	90.0%
70 or export 7 mag		01.470	102.070	30.070
Canada				
Construct Sell Price	\$390	\$356	\$370	\$361
ABS Export Price	\$270	\$262	\$247	\$247
Dumping Margin	\$120	\$94	\$123	\$114
% of Export Price	44.4%	35.9%	49.8%	46.2%
Czech Republic				-
Construct Sell Price	\$391	\$400	\$420	\$408
Deduct Export Price	\$260	\$268	\$249	\$225
Dumping Margin	\$131	\$132	\$171	\$183
% of Export Price	50.4%	49.25%	68.7%	81.3%
Estonia				
Construct Sell Price	\$290	\$292	\$292	\$285
Deduct Export Price	\$268	\$247	\$224	\$234
Dumping Margin	\$22	\$45	\$68	\$51
% of Export Price	8.2%	18.2%	30.4%	21.8
Germany			·	
Construct Sell Price	\$427	\$432	\$444	\$420
ABS Export Price	\$273	\$281	\$281	\$255
Dumping Margin	\$154	\$151	\$163	\$165
% of Export Price	56.4%	53.7%	58.0%	64.7%
70 OF EMPORET HOS	50.476	30.770	55.575	04.170
Lithuania				
Construct Sell Price	\$360	\$375	\$387	\$382
Deduct Export Price	\$224	\$199	\$170	\$178
Dumping Margin	\$166	\$176	\$217	\$204
% of Export Price	74.1%	88.4%	127.6%	114.6%
Sweden				
Construct Sell Price	\$316	\$328	\$338	\$334
Deduct Export Price		\$247	\$222	\$236
Dumping Margin	\$61	\$81	\$116	\$98
% of Export Price	23.9%	32.8%	52.3%	41.5%
USA				
Construct Sell Price	\$385	\$352	\$336	\$357
ABS Export Price	\$310	\$291	\$296	\$278
Dumping Margin	\$75	\$61	\$40	\$79
% of Export Price	24.2%	21.0%	13.5%	28.4%
	L7.L/0	L 1.0/0	10.070	4U.7/0

Source: Please refer to Constructed Selling Price information for each source country (Confidential Attachment 8-4.1), Deductive Export Price schedules for exports from Austria, Czech Republic, Estonia, Lithuania and Sweden (Confidential Attachment B-2.4), and ABS data for exports from Canada, Germany and the USA (provided in soft copy form).

2. Show dumping margins as a percentage of the export price.

Dumping margins as a percentage of export prices have been calculated in Table B-6.1 above. Applicable *prima facie* dumping margins for structural timber exported to Australia from the nominated countries over the period 1 April 2010 to 31 March 2011, on a quarterly basis, are as follows:

- Austria dumping margins in the range 64.4 to 102.8 per cent;
- Canada dumping margins in the range 35.9 to 48.9 per cent;
- Czech Republic dumping margins in the range 49.25 to 81.3 per cent;
- Estonia dumping margins in the range 8.2 to 30.4 per cent;
 - Germany dumping margins in the range 53.7 to 64.7 per cent;
- Lithuania dumping margins in the range 74.1 to 127.6 per cent;
- Sweden dumping margins in the range 23.9 to 52.3 per cent; and
- the USA dumping margins in the range 13.5 to 28.4 per cent.

All *prima facie* dumping margins are above negligible levels (i.e. 2 per cent) over the identified twelve-month period, with significant margins evident.

PART C

SUPPLEMENTARY SECTION

IMPORTANT

Replies to questions in Part C are not mandatory in all instances, but may be essential for certain applications.

You should contact the Customs Dumping Liaison Unit before answering any question in this part:

2 (02) 6275-6066 Fax (02) 6275-6990

C-1 Subsidy

- Identify the subsidy paid in the country of export or origin. Provide supporting evidence including details of:
 - (i) the nature and title of the subsidy;
 - (ii) the government agency responsible for administering the subsidy;
 - (iii) the recipients of the subsidy; and
 - (iv) the amount of the subsidy.

This application is made in respect of anti-dumping measures to apply to exports of structural timber from the nominated countries, therefore this question does not apply to this application.

C-2. Threat of material injury

Address this section if the application relies <u>solely</u> on threat of material injury (ie where material injury to an Australian industry is not yet evident).

- Identify the change in circumstances that has created a situation where threat of material injury to an Australian industry from dumping/subsidisation is forseeable and imminent, for example by having regard to:
 - 1. the rate of increase of dumped/subsidised imports;
 - 2. changes to the available capacity of the exporter(s);
 - the prices of imports that will have a significant depressing or suppressing effect on domestic prices and lead to further imports;
 - 4. inventories of the product to be investigated; or
 - 5. any other relevant factor(s).

The Australian industry has experienced material injury from the allegedly dumped exports of structural timber from Austria, Canada, Czech Republic, Estonia, Germany, Lithuania, Sweden and the USA. There has been a dramatic increase in the volume of imports from the nominated countries between 2009/10 and the 2010/11 year – an increase of approximately 20 per cent.

The applicant industry considers that in the absence of effective anti-dumping measures the industry will experience further material injury. The material injury from the dumping, therefore, can be viewed as foreseeable and imminent in the absence of any dumping measures.

2. If appropriate, include an analysis of trends (or a projection of trends) and market conditions illustrating that the threat is both forseeable and imminent.

On the basis of recent increases in import volumes of the allegedly dumped imports (a comparison of 2009/10 year volumes with pro-rated 2010/11 volumes to March 2011), further material injury to the Australian industry manufacturing structural timber is foreseeable and imminent.

C-3. Close processed agricultural goods

Where it is established that the like (processed) goods are closely related to the locally produced (unprocessed) raw agricultural goods, then – for the purposes of injury assessment – the producers of the raw agricultural goods may form part of the Australian industry. This section is to be completed only where processed agricultural goods are the subject of the application. Applicants are advised to contact the Dumping Liaison Unit before completing this section 2 (02) 6275-6066 Fax (02) 6275-6990.

1. Fully describe the locally produced raw agricultural goods.

The goods the subject of this application are not considered 'raw agricultural goods'.

P	ublic File Copy		40

Provide details showing that the raw agricultural goods are devoted substantially or completely to the processed agricultural goods.

This question is not applicable to the goods the subject of this application.

Provide details showing that the processed agricultural goods are derived substantially or completely from the raw agricultural goods.

This question is not applicable to the goods the subject of this application.

4. Provide information to establish either:

- a close relationship between the price of the raw agricultural goods and the processed agricultural goods; or
- that the cost of the raw agricultural goods is a significant part of the production cost of the processed agricultural goods.

This question is not applicable to the goods the subject of this application.

C-4. Exports from a non-market economy

 Provide evidence the country of export is a non-market economy. A non-market economy exists where the government has a monopoly, or a substantial monopoly, of trade in the country of export and determines (or substantially influences) the domestic price of like goods in that country.

The countries of export identified in this application are not considered non-market economy countries, hence this question is not applicable.

2. Nominate a comparable market economy to establish selling prices.

The countries of export identified in this application are not considered non-market economy countries, hence this question is not applicable.

3. Explain the basis for selection of the comparable market economy country.

The countries of export identified in this application are not considered non-market economy countries, hence this question is not applicable.

Indicate the selling price (or the cost to make and sell) for each grade, model or type
of the goods sold in the comparable market economy country. Provide supporting
evidence.

The countries of export identified in this application are not considered non-market economy countries, hence this question is not applicable.

C-5 Exports from an 'economy in transition'

 Provide information establishing that the country of export is an 'economy in transition'.

The countries of export identified in this application are not considered 'economy-intransition' countries, hence this question is not applicable. A price control situation exists where the price of the goods is controlled or substantially controlled by a government in the country of export. Provide evidence that a price control situation exists in the country of export in respect of like goods.

The countries of export identified in this application are not considered 'economy-intransition' countries, hence this question is not applicable.

 Provide information (reasonably available to you) that raw material inputs used in manufacturing/producing the exported goods are supplied by an enterprise wholly owned by a government, at any level, of the country of export.

The countries of export identified in this application are not considered 'economy-intransition' countries, hence this question is not applicable.

 Estimate a 'normal value' for the goods in the country of export for comparison with export price. Provide evidence to support your estimate.

The countries of export identified in this application are not considered 'economy-intransition' countries, hence this question is not applicable.

C-6 Aggregation of Volumes of dumped goods

Only answer this question if required by question B.1.5 of the application and action is sought against countries that individually account for less than 3% of total imports from all countries (or 4% in the case of subsidised goods from developing countries). To be included in an investigation, they must collectively account for more than 7% of the total (or 9% in the case of subsidised goods from developing countries).

	Quantity	%	Value	%
All imports into Australia		100%		100%
Total				

Import volumes of the GUC from each of the countries identified in this application exceed the three per cent of total import volume from all countries across the nine-month period to 31 March 2011.

It is not anticipated that the export volumes for the whole of the 2010/11 year will fall below the negligible volume level (of 3 per cent of total import volume).

APPENDICES	
Appendix A1	Australian Production
Appendix A2	Australian Market
Appendix A3	Sales Turnover
Appendix A4	Domestic Sales
Appendix A5	Sales of Other Production (Not Applicable)
Appendix A6.1	Cost to Make and Sell (& profit) Domestic Sales
Appendix A6.2	Cost to Make and Sell (& profit) Export Sales
Appendix A7	Other Injury Factors
Appendix A8	Authority to Deal With Representative

Industry Non-Confidential Attachment B-1.5

Summary of ABS import Data for Structural Timber 2007/08 to 2010/11

(Source data provided with application and is not for further distribution)

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· Cenada 34568	10853826	313 98	49308	14161374	287 20	35286	8242348	233 52			37891	
Czech Republic 77297	24711585	319.70	74652	25451968	340 94	8058	27346019	310 55		ge ·	85056	
	4651257	318 45	21573	7414478	343 69	37973	12720329	334.98		8	68865	
•	10897554	279 61	45508	13456275	295.69	44833	13024490	280 51		\$063	2	
	1636339	305.97	7567	2365119	312 56	11585	2896513	250 02		21582	×	
	1750219	346.24	8214	2459902	299.48	15049	4538733	301.60		29308	₹	
	413355	427 02	3593	1127211	313.72	16826	4687261	278 57		19768	~	
ota: 2	70638303	294 92	291963	68685959	303.79	293175	83690233	285.46		347545		105544584
Non-Dumped												
New Zealand 238214	147285549	618 21	224756	133561352	594.25	191823	117841684	614 33		192266		115402797
	14365961	707 65	18201	14476558	785 37	14639	8504205	580.93		24890		15820884
Sub-Total 258515	181631500	625 23	242957	148037910	609 32	208462	126345889	611.98		217156		131223681
Total Imports -498034	232269803	486 37	534970	236733869	442.58	499637	210036122	420 38		564701	_	236788265
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FY 2008 Fy 2009		FY 2010 FY 2011	=			FY 2008		Ev 2009 FY 2010 FY 2011	7	į		
Dumped Imports			=			3		3	3	à		
Austria 100	130 06	69 46 63	63.49				12 59	15.24	8.72	7.05		
	142.64		109.90				694	9.22	7 86	6 73		
Czech Republic 100	96 56		100				15 52	13 98	17.62	15 06		
Estonia 100	147.70	259.96 477	472.17				2.93	<u>\$</u>	8	12.21		
	11677		115.62				7 83	8.51	8.97	7.98		
	141.49		403.55				1 07	=	2.32	3.82		
	162 49		579 78				101	ŕ	3.01	5.19		
	371.18		2.15				0 19	0.67	3 37	35		
	3											
Sub-Total	121 90	122.40	145 10				48 09	8	58 68	5		
Non-Dumped												
New Zealand 100	e S		80 71				47 83	28	36.36	8	•	•
	89 66 66	72.11 125	122.60				\$	3.40	293	4.		
Sub-Total 100	22		8				51 91	15 42	4132	38 AS		
Total Imports 100	107 41	200	117 70									

CHHWPA Non-Confidential Attachment A-3.3

CHHWPA Product Information

CarterHoltHarvey Woodproducts Australia

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Structural Building

Products

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LASERframe

Untreated

LASERframe

TERMINATOR Red

LASERframe

ERMINATOR Blue

ALLseasons
SHADOWolad

ECOpty

PLYroof

Engineered Products

Plywood Products
Flooring

Decorative

Commercial & Manufacturing

Outdoor

MSDS

Pro Le Guarantees

Design Software

Panelised Building System

te by TinSoldier A

LASERframe® Untreated

LASERframe Untreated is a structural timber used for residential and commercial building framing. It has evolved from years of development in the manufacturing process with machine stress grading & kiln drying techniques with advanced control equipment.



Description Range Technical Images MSDS

LASER/frame renewable plantation pine framing, grown in sustainably managed, Australian Forestry Standard (AFS) or FSC (Fores Stewardship Council) certified plantations.

You can be confident that every stick of LASERframe has been quality assured and graded and tested according to Australian Standards.

LASERframe combines strength and cost-effectiveness with total design flexibility. Pine Framing has been used by generations of Australian builders and is preferred over other structural materials due to its high strength to weight ratio, flexibility and ease of use.

Pine is the ideal building material as it's widely available and competitively priced. Carter Holt Harvey Wood Products has a full range of building components for your building needs.

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Structural Bullding

Products LASERframe

LASERframo

LASERframe® Untreated

LASERframe Untreated is a structural timber used for residential and commercial building framing. It has evolved from years of development in the manufacturing process with machine stress grading & kiln drying techniques with advanced control equipment.



EKSEKI BIJO	Description	Range Technical	Images MSDS					
Untreated	E-	nd Section			_			
LASERframe			Available Lengths (m)	,	Fran	ming		
	Depth (mm)	Thickness (mm)	- , ,	NSW	QLD	SA	AIC	
TERMINATOR Red	70	35	0.9 - 6.0	1	1		·· 🗸	:
LASERfraine	90	35	0.9 - 6.0	1	1	1	1	
ERMINATOR Blue	120	35	1.2 - 6.0	✓	1	1	1	
ALI seasons	140	35	1.2 - 6.0	1	~	✓	1	
	190	45	1.2 - 6.0	1	1	1	4	
SHADOWcład	70	45	0.9 ~ 6.0	1	1	1	✓	
ECOply	90	45	0.9 - 6.0	✓	4	1	1	
PLYroof	120	45	1.2 - 6.0			1	~	
	140	45	1.2 - 6.0	1	1	1	1	
Engineered Products	190	45	1.2 - 6.0	1	1	•	✓	
Flywood Products	240	45	1.2 - 6.0	✓	~	1		
Flooring	290	45	1.2 - 6.0	1		1	4	
Decorative	End Section			Battens				
Commercial & Manufacturing	Depth (mm)	Thickness (mm)	Grade					
Outdoor		• •		NSW	QLD	SA	AIC	
MSDS	42	35	Standard		1	1		
Product Guarantees	42	35	Run of Mill	✓	1	1	✓	
Design Software	42	42	Standard			✓		
Panelised Building System								

Legend

- Available in MGP 10, 12 & limited MGP 15
- Available in MGP 10 or F5/F7

e by TinScidler À

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TERMINATOR Red LASER TERMIN

LASERframe

SHADOWclad

ERMINATOR Blue considerations

Alltseasons SHADOWcla

ECOply ECOpty FLYroof

PLYreof Engineered Pro

Plywood Produc Engineered Products Eleorina Plywood Products Decorative Fleoring

Commercial & N Decorative

Outdoor Commercial & Manufacturing

Outdoor Product Guarant MSDS

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. Software Product Guarantees Panelised Builde Design Software

Panelised Building System

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LASERframe® Untreated

LASERframe Untreated is a structural timber used for residential and commercial building framing. It has evolved from years of development in the manufacturing process with machine stress grading & kiln drying techniques with advanced control equipment

Description Range Technical Images MSDS

COMPLIANCE & CERTIFICATION

Laserframe structural Timber may be used in conjunction with the following Australian Standards:

• AS 1684 - Residential Timber Framed construction AS 1720 - Timber Structures Code, Part 1

and any other building code or Australian Standard that makes reference to MGP product.

Laserframe is graded in our Sawmills in accordance to AS/NZS 1748 - Mechanically stress-graded timber.

Timber Standards and BCA

STRUCTURAL PROPERTIES

All Laserframe is killn dried to meet standards, planed to accurate and consistent dimensions passed through a Metriguard machine stress grader, and visually inspected by our well trained Timber graders for strength and utility overrides. Each stick is then branded confirming its grade and the mill where it was manufactured.

Carter Holt Harvey maintains a robust product quality monitoring system where regular random samples are tested to verify both strength and stiffness properties in accordance with the testing requirements of the appropriate Australian Standards as required through AS/NZS 1748.

Carter Holt Harvey Woodproducts Australia maintains a third party audit by an external body to ensure our continuance monitoring systems are maintained and inline with our Claims of Australian Standards.

Refer to the Australian Standards above for engineering properties

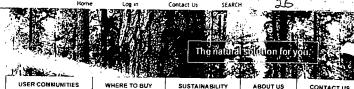
FRFF TIMBER DESIGN SOFTWARE

FEATURES: Beam sizing grouped into floor, wall and roof applications



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OUR PRODUCTS Structural Building

Products

OUR SOLUTIONS

LASERframe TERMINATOR® Blue

LASERframe TERMINATOR Blue Pine framing from Carter Holt Harvey is structural pine framing which has been specially treated to protect against termite attack and damage and it comes with a 25 year



LASERframe Untreated

LASERframe

LASERfraine TERMINATOR Red

LASERframe

TERMINATOR Blue

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Engineered Products

Plywood Products

Fleorina Decorative

Commercial & Manufacturing

Outdoor

MSDS

Product Guarantees

Panelised Building System

. Software

e by TinScidler 4

guarantee* for peace of mind.

Description Range Technical images MSDS

TERMINATOR Blue is suitable for residential house and light commercial applications such as wall frames and roof trusses. It is for Inside/Interior, above-ground framing applications only.

TERMINATOR Blue is a new generation envelope H2-F termite-protected timber. It protects against all termites except the more feroclous Mastotermes darwinlensis found north of the tropic of capricorn, therefore is sultable for use South of the Tropic of Capricom only.

TERMINATOR Blue ensures your framing solution is termite resistant as well as cost-effective.

It's made from seasoned, dressed, machine-graded plantation radiata plne, you can identify Carter Holt Harvey Blue Pine by its bloom to be a seasoned, dressed, machine-graded plantation radiata plne, you can identify Carter Holt Harvey Blue Pine by its bloom to be a seasoned. dve and labelling.

Whether you're building a new home or making an addition, choosing your termite management systems is one of the most important decisions you'll make.

*Backed by the chemical supplier.

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OUR PRODUCTS

OUR SOLUTIONS

Structural Building

LASERframe

Products

LASERframe TERMINATOR® Blue

LASERframe TERMINATOR Blue Pine framing from Carter Holt Harvey is structural pine framing which has been specially treated to protect against termite attack and damage and it comes with a 25 year guarantee* for peace of mind.



LASERframe Untreated	Description	Range Technical	Images MSD	s			
LASERframe				Av	ilable	Grade	.
TERMINATOR Red	Depth (mm)	Thickness (mm)	Lengths (m)		P 10 8		
LASERframe				NSW	QLΦ	SA	Vic
TERMINATOR Blue	70	35	0.9 - 6.0	✓	1	÷	1
TERMINATOR SIDE	90	35	0.9 - 6.0	.	~		1
Actseasons	120	35	1.2 - 6.0	v		~	4
SHADOWclad	140	35	1.2 - 6.0	1	~	v	1
ECOply	190	35	1.2 - 6.0	√	✓	•	~
ЕСОРІУ	70	45	0.9 - 6.0	1	~	/	1
PLYroof	90	45	0.9 - 6.0	1	4	J	1
Engineered Products	120	45	12-60	1	1	✓	~
Plywood Products	140	45	1.2 - 6.0	✓	1	1	1
Flooring	190	45	1.2 - 6.0	~			✓
Decorative		. Valley Boar	ds				
Commercial & Manufacturing	100	25	4.8 - 6.0	~			✓
Outdoor	190	19	4.8 - 6.0			✓	1

Please use this as a guide only. Range and lengths available may change.

Product Guarantees

De. .. Software

MSDS

Panelised Building System

te by TinSoldler *

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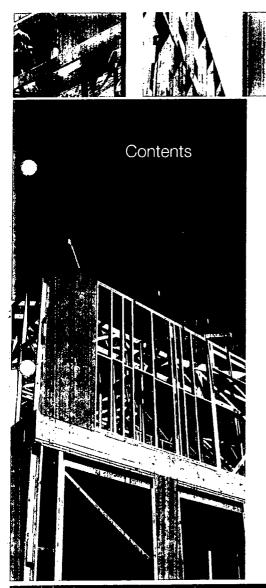
Hyne Non-Confidential Attachment A-3.3

Hyne Structural Timber Information



Make sure it will stand the test of time.







Hyne Frame

Hyne is an Australian manufacturer of locally grown structural products made from renewable Australian plantation softwood. As a privately owned Australian company, we offer a complete and comprehensive range of structural softwood framing.

For many, building a new home is the most important financial commitment that they ever make. That is wrivit is important to know that the materials which have up the home are not only high quality products but that they provide comfort and security about the investment.

Hyne Frame delivers the consistency and accuracy that ensures new house or renovation designs deliver strength, stability and security for the structural elements. They allow quality construction, at a low cost and with minimal building time.

We're confident, when you consider all the benefits of Hyne Frame Value, that you'll choose it every time.

Hyne Frame - Consistent, Structural, Secure.

GREENHOUSE POSITIVE...

With a growing focus on building materials that have low impact on the construction site, for building materials to be tray green, it's all about where they're sourced and the environment impact of their manufaction. The simple fact is, responsibly sourced plantation limber products such to represent a considerable products such that actually help to reduce greenhouse gas emission.

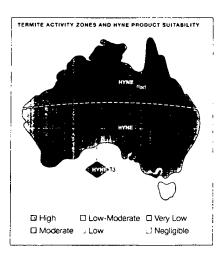
ALL OVER PROTECTION, ALL OVER AUSTRALIA





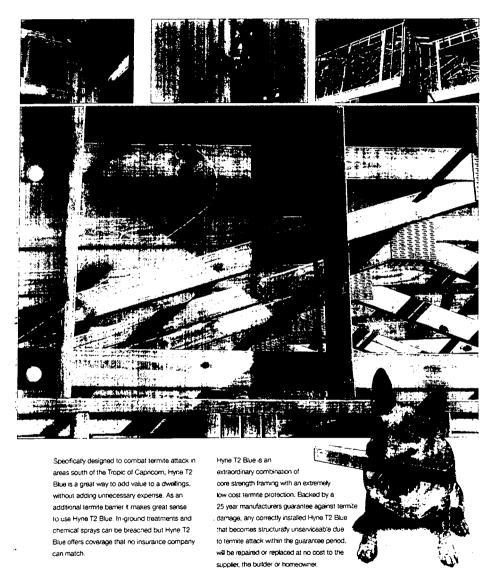
Australia wide. Hyne "T" treated structural timber products provide complete termite protection, guaranteed. Hyne T2 Brue, Australia's first and leading termite protected framing timber, for south of the Tropic of Capricom: Hyne T2 Red. specifically developed against mastotermes in the tropical north; and Hyne T3 Green, our range of treated framing for outdoor, above ground applications, are all guaranteed for an incredible 25 years.

The Hyne "T" treated timber guarantee is provided free to the purchaser or owner of Hyne Termite Resistant timber. This protection is approved by the Australian Pesticides 3 Veterinary Medicines Authority in accordance with AS1604.1 and are deemed termite resistant under the Building Code of Australia and relevant Australian standards.





TERMITE PROTECTED STRUCTURAL BLUE PINE FRAMING











Hyne T2 Biue is non toxic, completely safe for use around children and in family homes and is fast becoming the preferred choice for structural softwood framing. It is also totally safe to handle, doesn't require additional equipment and off-cuts don't need any special disposal. Hyne T2 Blue coulon't be easier to use.

Hyne T2 Slue is a H2f level treatment which comples with AS 1604, the Timber Utilisation and Marketing Act in Queensland and the Timber Marketing Act in NSW. It meets the requirements (south of the Tropic of Capincom) as a termite resistant timber as specified in the Budding Code of Australia.

GRADES

Utility, F5, MGP10, MGP12, MGP15

LENGTHS

Hyne T2 Blue is packaged in set length packs ranging from 2.4 to 6.0m. Check with your Hyne representative for alternative stud lengths.

GUARANTEE

Hyne guarantees that Hyne T2 Blue used in construction is resistant against termite attack for a period of 25 years from the date of supply.

Any correctly installed Hyne T2 Blue that becomes structurally unserviceable due to termite attack within the guarantee period will be repaired or replaced at no cost to the homeowner.

WHAT HAZARD LEVEL IS HYNE T2 BLUE?

Hyne T2 Blue is a Hazard Level 2 (H2F) treatment for use in above ground non-exposed situations for all non-tropical areas of Australia as protection against termine attack. Hazard Level 2 (H2F) is defined as dry, interior building applications that are not subject to moisture or weather exposure.

WHERE CAN HYNE T2 BLUE BE USED?

Hyne T2 Blue is approved for use as a fermite resistant building material and is suitable for use as part of a whole of focuse protection barrier system that complies with AS 3600.1 or as an additional protection against possible termite infestation.

Hyne Timber recommends the use of Hyne T2 Blue as an additional barrier against termite attack. Use of Hyne T2 Blue structural framing in the construction of the wall frame and roof truss components of dwellings, combined with other normal termite barriers, provides additional protection against termites.

WHAT ABOUT CUTTING HYNE T2 BLUE?

Independent scientific testing has confirmed that Hyrle T2 Blue can be cut, notiched or drilled without any requirement for the exposed surface or the cut ends to be resealed. Hyrle T2 Blue must not be re-sawn, ripped or heavily planed as this may nullify the protection afforded by the preservative.

However, in instances where the surface has been worked. Hyne advocates the use of a re-sealer.

WILL HYNE T2 BLUE CORRODE METAL FITTINGS OR FASTENERS?

As the preservative formulation is noncorrosive, normal steel naiss and plates are suitable for use as fixings. Once dry the preservative will not affect nail or plate holding capacity.

IS HYNE T2 BLUE ENVIRONMENTALLY SAFE?

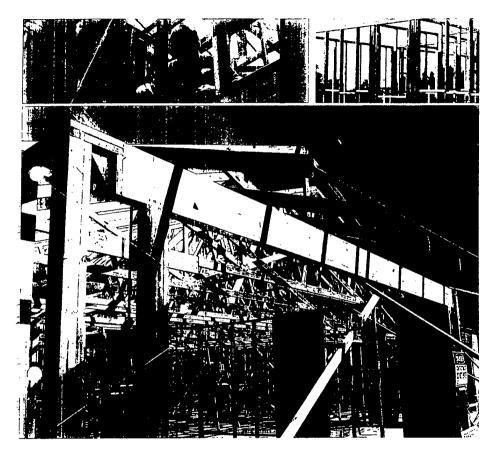
Absolutely, Numerous independent studies have found that timber sourced from well managed plantation resources has a low rist environmental impact, and much lower than most man made materials. The use of Hyne T2 Blue with safe organic based preservatives may also reduce or eliminate the need for other chemicals in the form of ground barrier treatments.

HOW DO I DISPOSE OF T2 BLUE OFFCUTS?

T2 Blue offcuts can be disposed of in landfill. It is not harmful to the environment. Hype recommends that T2 Blue should not be burnt.



ABSOLUTE PROTECTION AGAINST TROPICAL TERMITES



Hyne T2 Red is our easily identifiable, affordable, reactly available structural softwood framing that has become the preferred choice for new home owners and builders in tropical Queensland. Hyne T2 Red provides absolute protection against tropical termites (mastotermes darwinensis) while at the same time being totally safe for humans and other mammals and suitable for use in family homes.

Builders in the north know full we'll that building in the tropics has special requirements. Hyne T2 Red affords additional protection against termites and this full H2 level treatment of quality, mechanically graded Hyne Frame comes with a 25 year guarantee. The non-toxic nature of Hyne T2 Red means that it's completely safe to use and you won't be overwheimed by any odour.

For architects and designers, the protection provided for frames and trusses ensures their clients have peace of mind that their investment is secure against voracious north Queenstand termites. Fully compliant with AS 1604 and the Timber Utilisation and Marketing Act (TUMA) of Queensiand, Hyne T2 Red is deemed to comply as a termite resistant timber under the Building Code of Australia.









Tropical Queenstand timber merchants and wall frame and voot truss manufacturers source their supplies of Hyne T2 Red from the two Hyne Wholesale locations in Rockhampton and Carns, to provide their customers with the most suitable structural softwood framing for the tropics.

Unlike other building material like steel and masonly, "fyne "2 Red is actually greenhouse positive contributing to the origonity protection of our environment. Using Hyne T2 Red is the best choice of structural building material for the future in the tropical north.

GRADES

Utility, F5. MGP10. MGP12, MGP15

LENGTHS

Hyne T2 Red is packaged in set length packs ranging from 2.4 to 6.0m. Check with your Hyne representative for alternative stud engths.

GUARANTEE

Hyne guarantees that Hyne T2 Red used in the construction is resistant against termite attack for a period of 25 years from the data of supply

Any correctly installed Hyne T2 Red that becomes structurally unserviceable due to termite attack within the guarantee period will be repaired or replaced at no cost to the homeowner, subject to terms in the guarantee.

WHAT HAZARD LEVEL IS HYNE T2 RED?

Hyne T2 Red is a Hazard Level 2 (H2) freatment for use in above ground non-exposed situations for all areas of Austraia as protection against termite attack. Hazard Level 2 (H2) is defined as dry, interior building applications that are not subject to moisture or weather exposure.

WHAT IS THE TIMBER PRESERVATIVE IN HYNE T2 RED?

T2 Rea's preservative is based on synthetic pyrethroid insecticides. The actual insecticide is commonly used in many household, agriculture and even human use preparations such as head rice treatment. The formulation has been approved for use by the Australian Pesticides and Veterinary Medicines Authority (AVPMA) as well as state based regulatory bodies.

WHERE CAN HYNE T2 RED BE USED?

Hyne T2 is approved for use as a termite resistant building material and is suitable for use as part of a whole of house protection barrier system that complies with AS3660.1 or as an additional protection against cossible termite infestation.

Hyne recommends the use of Hyne T2 Red as an additional barrier against termite attack. Use of Hyne T2 Red structural framing in the construction of the wa'l frame and roof truss components of dwellings combined with other normal termite barriers provides additional protection against termites.

WHAT ABOUT CUTTING HYNE T2 RED?

The full sapwood benefication and termita resistant heartwood means that Hyne T2 Red can be cut, notiched or drilled without any requirement for the exposed surface or the cut ends to be reseated.

However, in instances where the beam surface has been worked. Hyne advocates the use of a re-sealer.

WILL HYNE T2 RED CORRODE METAL FITTINGS OR FASTENERS?

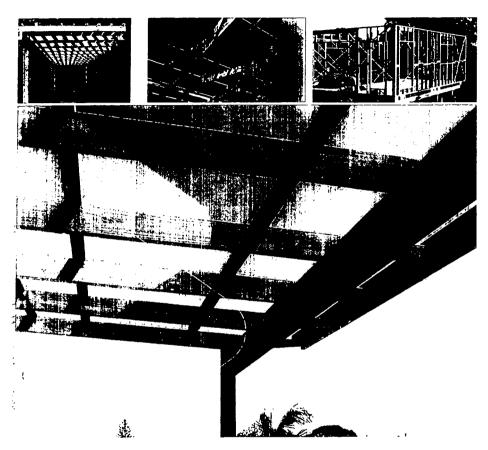
As the preservative formulation is noncorrosive, normal steel nails and plates are suitable for use as fixings. Once dry the preservative will not affect natior plate holding capacity.

HOW DO I DISPOSE OF T2 RED OFFCUTS?

T2 Red offcuts can be disposed of in landfill. It is not harmful to the environment. Hyne recommends that T2 Red should not be burnt.



MADE FOR THE GREAT OUTDOORS



Hyne T3 Green is the ideal choice for external, above ground, structural applications. Produced using MGP10, mechanically graded Hyne Frame for strength and reliability and H3 treated for outdoor durability. Hyne T3 Green is easily recognisable by its light green colour.

You can't go past Hyne T3 Green for pergolas and carports as well as verandahs and decks, and it's available in the commonly required sizes for these outdoor, end-use applications. Hyne T3 Green can be substituted, in most instances, for F5 and F7 visually graded H3 pine. Being totally nontoxic to humans, it is completely safe for budders to use.

For designers and specifiers, Hyrie T3 Green is able to replace lower visually graded H3 structural softwood products and every piece has been tested to ensure that it has the strength and reliability for the designed end-use application.

Stocking Hyne T3 Green simplifies things for merchants and other timber suppliers knowing that it may substitute for other F graded H3 structural products. Available in convenient pack lots from Hyne Wholesale, Hyne T3 Green becomes the natural choice for timber yard stocks.





GRADE

MGP10

SIZES

70, 90, 140, 190 x 35mm 70, 90, 140, 190, 240 x 45mm

LENGTHS

Hyne T3 Green is backaged in set length backs ranging from 2.4 to 5.0m in 0.6m increments.

GUARANTEE

Hyne guarantees Hyne T3 Green used in the construction for outdoor above ground use, for a period of 25 years from the date of supply.

Any correctly installed Hyne T3 Green that becomes structurally unserviceable within the guarantee period will be repaired or replaced at no cost to the homeowner subject to terms in the guarantee.

WHAT ARE THE ACTIVE INGREDIENTS OF T3 GREEN?

Hyne T3 Green contains H3 levels of the following:

- · Insecticide (for borers and termites)
- · Mouldicide and water repellent
- Fungicides

HOW DO I USE T3 GREEN?

T3 Green is a treated timber intended for use in exposed, above ground situations, such as deck and verandah bearers and joists: pergola, verandah and carport rafters and batteris; verandah and patro beams or facia beams; or any other external, above ground application requiring structural softwood framing, including children's playarounds.

DOES THE TREATMENT EFFECT STRENGTH OR DIMENSIONAL/STABILITY?

No. There is no effect on the mechanically graded MGP10 properties. There is no change in moisture content effecting dimensions.

CAN T3 GREEN BE GLUED?

Yes, T3 Green components may be gived successfully with any standard two pack give (not casein based products). The active ingredients and solvent carner have no harmful effects on fully cured achievas.

CAN I CUT, NOTCH AND PUT HOLES INTO 13 GREEN?

Yes, you may do all of these things to 73 Green. Hyne suggests, as best practice in all building applications, that all outling, notching, and holes be brushed or sprayed with a cut end preservative.

WHAT ABOUT PAINTING?

it is strongly recommended that T3 Green should be painted for all exterior, weather exposed applications to prevent bleaching, surface deterioration and mould.

Semi-transparent, penetrating timber stains

Apply 2 to 3 coats as per manufacturer's directions.

Solid colour exterior acryllc paints

Apply good quality, long oil-based extenor wood primer followed by two coats of premium quality exterior acrylic paint according to the manufacturer's recommendations.

Solid colour exterior gloss enamel

Apply good quality, long oil-based exterior wood primer followed by two coats of premium quality exterior gloss enamel paint according to the manufacturer's recommendations.

Clear or semi-transparent exterior gloss or varnish. Not recommended.

HOW DO I DISPOSE OF T3 GREEN OFFCUTS?

T3 Green offcuts can be disposed of in landfill. It is not harmful to the environment. Hyne recommends that T3 Green should not be burnt.

HYN Frame MGP GRADED STRUCTURAL PINE FRAMING



Hyne Frame is produced from plantation grown Australian softwood for structural use in building and complies with AS/NZ1748-1997 and AS1720.1-1997. Mechanical grading ensures that every piece of our F5. MGP10, MGP12, and MGP15 timber is checked to have the design properties and characteristics specified for its designated grade. The appropriate grade is inkiget marked onto the face of each piece for easy recognition.

Australian builders are familiar with MGP grades and can determine the appropriate size and grade required for the particular structural end use application. Hyne Frame is planer gauged after high

temperature kin drying, to ensure its consistent size and suitability, making it easy for builders to use.

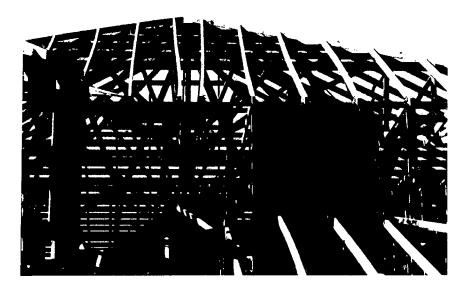
Building designers and specifiers understand the importance of selecting structural timber which is graded to be fit for purpose. In wall frames and roof trusses, Hyne Frame delivers the consisting and accuracy that will ensure that new house or renovation designs deliver strength and stability for the structural elements of the project.





11





Wall frame and noof truss manufacturers, as well as timber merchants, have come to rely upon their allocated availability of Hyne Frame. Delivered in requested regular volumes each month, either directly from the mill or from the local Hyne Wholesate. Hyne Frame provides a consistent reliable source of structural softwood framing for building in Australia.

WEBS

Hyne Frame webs for roof truss fabrication are also available mechanically stress graded as defined in AS1748. Lengths available 0.9, 1.2, 1.5, 1.8 and 2.1m.

GRADES

Utility, F5. MGP10, MGP12, MGP15

LENGTHS

Hyne Frame is packaged in set length packs ranging from 2.4 to 6.0m.

NOGGINS

Hyne Frame noggins are docked to length but are not required to be structurally graded. Lengths available are 0.415 m and 0.565 m.



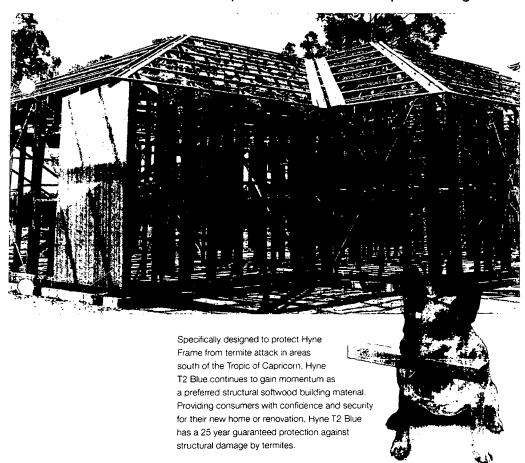
Hyne Product Info Service

T: 1300 30 4963 (Hyne) E: info@hyne.com.au hyne.com.au





Termite protected structural blue pine framing





Protected, Stable, Reliable,

These days, builders understand their clients concern about the security and structural integrity of their home, with more and more builders choosing Hyne T2 Blue to provide that additional level of protection against termites. Being non toxic to all mammals. Hyne T2 Blue is totally safe to handle and off-cuts are easily disposed of to landfill.

For architects, designers and specifiers, the knowledge that Hyne T2 Blue is extremely low cost means that specifying it makes great sense for their clients. Hyne T2 Blue is a H2F level treatment which complies with AS 1604, the Timber Utilisation and Marketing Act in Oueensland and the Timber Marketing Act in NSW and meets the requirements (south of the Tropic of Capncom) as a termite resistant timber as specified in the Building Code of Australia.

Timber merchants and truss and frame manufacturers can simply nominate Hyne T2 Blue as part of the allocation of Hyne Frame available from Hyne Wholesale.

Hyne T2 Blue is produced from renewable resources protecting our environment for future generations

IS HYNE T2 BLUE SAFE?

Yes. H2 is non toxic to all mammals. However, normal timber usage and handling precautions and personal hygiene should be observed at all times.

Numerous independent studies have also found that timber sourced from well managed plantation resources has a low net environmental impact, and much lower than most man made materials. The use of Hyne T2 Blue with safe organic based preservatives may also reduce or eliminate the need for other chemicals in the form of ground berrier treatments.

GRADES

Utility, F5, MGP10, MGP12, MGP15

LENGTHS

Hyne T2 Blue is packaged in set lengths packs ranging from 2.4 to 6.0m

GUARANTEE

Hyne guarantees that correctly installed Hyne T2 Blue is resistant against termite attack for a period of 25 years from the date of supply.

Any correctly installed Hyne T2 Blue that becomes structurally unserviceable due to termite attack within the guarantee period will be repaired or replaced at no cost to the homeowner subject to terms in the guarantee.

For more info call us on **1300 30 4963**, email info@hyne.com.au or visit **hyne.com.au**







Gunns Non-Confidential Attachment A-3.3

Gunns' structural timber Product Information











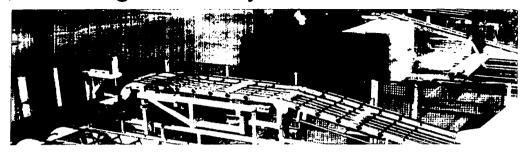




Gunns Structural Timber

Sustainable Australian Hardwood & Softwood

GoodWood SUPA 17[™] Strength. Reliability. Performance



GoodWood Structural

GoodWood SUPA 17th is a range of seasoned hardwood structural products manufactured from A17 grade Victorian Ash. Visually stress graded in accordance with the Australian Standard AS 2082, SUPA 17th is externally audited to ensure product compliance and is ideal where high strength to weight ratio is required.

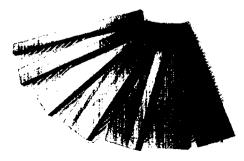
Rigorous external quality audits and greater spanning ability makes GoodWood SUPA 17th superior to traditional F17.

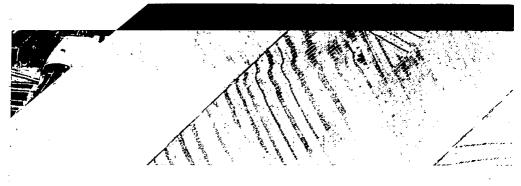
Applications

- Bearers
- Lintels
- Counter beams
- Rafters
- Floor joists
- Strutting beams
- Hanging beams
- Wall stuck
- Intermediate beams
- Underpurlins

Features & Benefits

- Straightness
- Stability
- Strength
- Long lengths
- Quality Assurance
- · Sustainable, AFS/PEFC certified resource
- Cost efficiency
- · Easy handling pencil round edges
- Ready availability
- Lyctus resistant
- · H2 Treated (LOSP) or untreated





Standards

Complies with the following Australian Standards:

AS2082	Visually stress graded hardwood for structural purposes
A\$1604.1 - 2005	Specification for preservative treatment/sawn and round
A\$1684.1 - 1999	Residential Timber Framed construction design criteria
AS - NZS4063 - 2010	Timber stress graded in grade strength and stiffness evaluation

Structural Sizes Supa17 (Vic Ash) & F17 (Tas Oak)

Width (mm)	Thickne	rss (mm)
	35	45
70	✓	✓
90	✓	✓
120	✓	✓
140	✓	✓
170	✓	✓
190	✓	~
220	✓	✓
240	✓	✓
290	✓	1

Joint Group

GoodWood SUPA 17[™] has Joint Group and Strength Group classifications of JD3 and SD3.

LOSP Treated H2

LOSP = Light Organic Solvent Preservative. Approved for use throughout Australia including North of the Tropic of Capricorn.

- · Non-toxic, red treatment colour
- Impregnates the timber with synthetic pyrethoids, providing an envelope treatment to H2 as per A\$1604.1
- Suitable for both interior and protected above ground applications
- Tested by the Department of Primary Industries & Fisheries, OLD
- Forest Research Chemistry Laboratory Test Certificate 11212
- · Rough sawn or dressed sizes, straight edged
- Lengths from 900 mm 5.4m in 300mm increments
- 35mm and 45mm dressed

SUPALAM™ A17, SUPALAM GL18C™ & SUPACHORD™

SupaLam Range

SUPALAM™ is a range of hardwood products produced by Gunns Timber Products from forestry certified and sustainable regrowth Victorian Ash. Products currently include SUPALAM™AT7 structural beams, SUPALAM™GL18 laminated beams, SUPACHORD™ and SUPASTAIR™ staircase components.

The manufacturing process at Gunns Timber Products Heyfield in Victoria is comprised of finger joining and laminating of fully seasoned hardwood using advanced production technology and highly automated operation.

A major environmental feature Gunns Timber Products' Heyfield production is third party forestry certification, and the long-term sustainability of regrowth Victorian Ash.

The manufacturing process uses PURBOND^{op} polyurethane adhesive which is formaldehyde free, eliminating an emerging safety issue with resortinol adhesives in common use for structural timber products. This combination of environmental credentials provides a product that is ideal for environmentally stringent specifications in construction.

SUPALAM A17

- SUPALAM™A17 performs better than F17
- · Fully seasoned Victorian Ash
- Lengths up to 72 metres
- · Glue-laminated and finger joined
- · True to size and straight
- Also H2 treated

The typical applications of SUPALAM A17 include:

- Floor systems
- Wall framing
- Window lintels
- Support Beams
- · Roof Beams

The major features of SUPALAM A17 include:

- · Price competitive
- · Pencil round edges
- Superior span capacity
- · High nail holding strength
- Clear glue lines
- · Sustainable Victorian Ash
- · Environmentally friendly

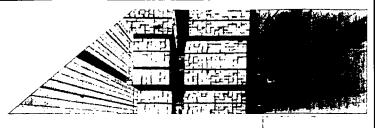
Sizes & lengths available

Width (mm)	Thickne	ıss (mm)
	35	45
90	✓	✓
120	✓	✓
140	✓	✓
170	✓	✓
190	✓	✓
240	✓	✓
290	✓	✓

Lengths - 0.3 increments up to 7.2 metres.

SUPALAM GLISC laminated beams are manufactured from sustainable Victorian Ash hardwood combined with environment friendly adhesive.

- · High performance sustainable hardwood
- Longer spans than GL17 at no extra cost
- Accredited by GLTAA .
- · Third party quality assurance certification
- · Light coloured Victorian Ash
- · Fully dressed faces



The typical applications of SUPALAM GL18C include:

- · Residential and commercial construction
- Roof beams
- · Window lintels
- Floor bearers
- · Beams for all building applications

The major features of SUPALAM GL18C include:

- Price competitive
- · Structural 'B' grade Appearance
- · Visually dean and attractive
- Available in H2 treated
- Environmentally friendly

Sizes and lengths available

Depths (mm)		Widths (mm)	
	65	85	115
120	✓	✓	✓
155	✓	✓	✓
185	✓	✓	✓
215	✓	✓	✓
240	✓	✓	✓
270	✓	✓	✓
300	✓	✓	✓
330	✓	✓	1
360	✓	✓	✓
390	✓	✓	✓
420	✓	✓	✓

Lengths – up to 7.2 metres, longer lengths available by special order.

SUPACHORD Iaminated hardwood is another high performance product from GTP – for consistency and economy in roof truss manufacture.

The typical applications of SUPACHORD include:

- · Bottom chords in girder trusses
- · Long span roof truss components
- High load carrying roof trusses
- · Visually exposed feature trusses

The major features of SUPACHORD include:

- Ensures consistent bottom chord camber
- · Accurate sizes match timber sections
- Exactly straight for faster jig set-up
- · Set length packs up to 7.2 metres
- · Less chord splices required
- Available in H2 LOSP treated
- · Rounded edges for easy handling
- Formaldehyde-free clear adhesive
- Environment friendly

The structural performance of SUPACHORD

- · Properties in roof truss design software
- Fully tested and certified values

· Low deflection characteristics

- · High strength hardwood performance
- · Proof testing ensures structural reliability

Sizes and lengths available

Width (mm)	Thickness (mm)
	35
90	✓
120	✓
140	✓
170	✓
190	✓

Lengths - 0.6 increments to 7.2 metres.

Finish

Fully dressed faces with rounded edges.

Laminated GoodWood: Staircase Components, Structural Applications, Kitchens.



Laminated GoodWood Australian Hardwood, manufactured from Eucalyptus delegaterisis (Alpine Ash) and regnans (Mountain Ash), provides wider widths and thicker thicknesses, maximising the use of smaller regrowth logs. Ensures cost effective supply of thick wide boards.

GTP also produces the SupaLam^{**} range, a finger jointed, edge laminated product made from GoodWood Australian Hardwood.

Features & Benefits

Stability – visually graded kiln dried hardwood dimensionally stable making it an ideal species to laminate.

Strength - major benefit of glue lamination is the increase in strength that can be achieved through randomisation of natural timber defects in the laminating process.

Impact resistance – laminated GoodWood with a high izod reading of 18-20 joules has the ability to absorb high impact loads for short periods with no adverse effects.

Workability - glue laminated product is easy to work with using standard carpentry tools.

Fire resistance – large sections have a high fire resistance and char but still maintain their structural integrity for a long period of timed.

Colour matching – range from pale pink to straw tones through to nut brown. Every attempt is made to produce gibe laminate that has a high level of colour consistency as well as performance consistency, so that the appearance of the finished product is that of a solid piece of timber.

Glue laminated products available in Select Grade.

Resistance to chemicals – timber is unaffected by most chemicals and resistant to degradation by salt air which can quickly compde other building materials.

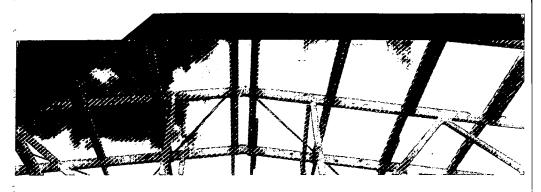
Reliability – laminated components are manufactured to strict quality requirements from kiln dried visually graded Australian Hardwood which has proven history of high performance.

Glue type used in appearance products – Duro – lok 2150 (2 parts, Cross Likening PVA) conforms to the European BS FN 204 – exposure group D4 (white glue drying dear)

Glue laminated timber is suitable for the following range of applications.

Product	Dressed Size (mm)	No of laminations	Length Specification
Stringer	240 x 33	2 or 3	2.1m - 5.4m
	285 x 33	3 or 4	21m - 5.4m
	285 x 43	3 or 4	21m - 5.4m
Treads	285×33	3 or 4	0.9m, tm, 1.1m, 1.2m
	285×43	3 or 4	0.9m, 1m, 1.1m, 1.2m
Risers	190 x 19	2 or 3	0.9m - 5.4m
Squares	65 x 65	2	1.5m - 5.4m
	90 x 65	2	
	90×90	2 or 3	
	140×65	5	
Bench tops	450 x 30	7	0.9m - 5.4m
	600 x 30	9	0.9m - 5.4m
	750 x 30	11	0.9m - 5.4m
	900 x 30	13	0.9m - 5.4m





Treated/Untreated Pine Framing

Gunns Timber Products is one of Australia's largest producers of structural Radiata Pine products for the housing and construction industries. Supplying the market with Pine Timber Framing for wall frames, roof trusses, stick built construction and alteration and additions to Domestic and Commercial Constructions.

Gunns Timber Products structural timber is kiln dried under carefully controlled conditions. This makes it highly stable, stronger and stiffer.

Termite Resistant Pine

Gunns Timber Products also manufacturers preservative treated material through the in-fine treatment facility in Tarpeena. This timber is treated to H2F level and is blue in colour.

The termite treated timber range is ideal for internal walls, floor joists and roof framing, all of which are in concealed structural applications.

Visit www.gunnstimber.com.au to download a copy of the treatment guarantee.

Stress Grades

The method used to stress grade GTP structural pine products is the MGP grade system (Machine Graded Pine) or the F-Grade system. The higher the MGP or F-Grade the stiffer and stronger the timber.

Three MGP Stress Grades produced to AS1748 are currently available: MGP10/MGP12/MGP15

F-Grades visually graded to AS2858 or machine stress graded to AS1748 include:

F5/F7

MGP 10/12/15 Framing (MGP15 Range subject to availability)

Width (mm)	Thickness (mm)	
	35	45
70	✓	✓
90	✓	·
120	✓	✓

Available in lengths 2.4 to 6.0 metres.

MSG P5 Studs

Width (mm)	Thickness (mm)		
	35	45	
70	✓	-	
90	1	✓	

Available in lengths 2.4 and 2.7 metres.

MGP10 / F7 Microline Beams & DAR Beams

Sizes

Thickness (mm)	
35	4
✓	~
✓	~
✓	√

Available in lengths 3.6 to 6.0 metres.

Contact Details

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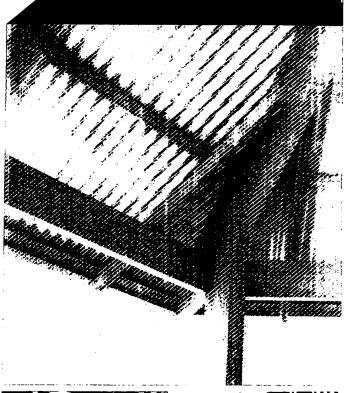
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