

For Publication

The Director
Operations 1
Anti-Dumping Commission
Customs House
1010 Latrobe Street, Docklands
MELBOURNE VIC 3000

10 December 2014

Attention: Mr Jukka Mäntynen

Dear Sir

Newsprint Exported from Korea and France Seven West Media Injury Submission

We refer to Norske Skog's letter dated 1 December 2014 which was recently published on the electronic public record.

Although elements of that letter are redacted, it is evident that some of the matters addressed in it may refer to or otherwise concern our client. Accordingly our client responds to the following matters, adopting the headings in the Norske Skog letter.

Recycled Paper

On the assumption that this matter relates to our client, the representation that Norske Skog had not been notified that recycled paper was a supply requirement is, respectfully, mistaken. [Reasons provided].

As to the representation that Norske Skog's newsprint performs "as well if not better than the newsprint made from 100% recycled paper", our client rejects that claim [Reasons provided]..

[Customer] Contract

We are uncertain as to which particular tenderer is being referred to however a supply contract that commences after the investigation period is irrelevant and cannot be taken into account by the ADC. Additionally, as to Norske Skog's 'deduct[tion]', concerning pricing as referred to in its letter, that is mere supposition and speculation. As is well known by the ADC, speculation must be excluded from all consideration - speculation is not a proxy for actual proof.

Yours sincerely

Zac Chami, Partner +61 2 9353 4744

zchami@claytonutz.com

Our ref 11276/80155314