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26 October 2016

Mr Tim King
Case Manager
Dumping Operations
Anti-Dumping Authority
Level 35, 55 Collins Street
Melbourne Victoria 3000

Public File

Dear Mr King

Investigation No. 341 – A4 Copy Paper exported from Brazil, P R China, Indonesia and Thailand – BJ Ball Importer Verification Report

I. Introduction

I refer to the importer verification report for B J Ball Pty Ltd ("BJ Ball") recently placed on the public file.

Australian Paper Pty Ltd ("AP") provides the following comments in relation to the findings of the Anti-Dumping Commission ("the Commission") and certain comments included at Section 5 of the BJ Ball report.

II. BJ Ball's imports

BJ Ball has imported from APRIL Fine Paper Trading Pty Ltd ("APRIL") and Greenpoint Global Trading (Macao Commercial Offshore) Ltd ("Greenpoint"). Imports from Greenpoint accounted for less than 1 per cent of BJ Ball's sales during the investigation period.

The Commission confirmed of the 10 shipments selected for verification purposes, all 10 shipments were sold at a loss in Australia during the investigation period. As a result, the Commission has determined that the transactions between APRIL and BJ Ball were non arms length transactions. The export prices for BJ Ball therefore have been determined under s.269TAB(a)(b) using the selling prices by BJ Ball to its customers, less prescribed deductions.

AP submits that the Commission's finding that BJ Ball sold its imported A4 copy paper at a loss is consistent with the pricing offers that AP experienced during the investigation period at levels that undercut AP.

III. BJ Ball's comments

AP considers it is extraordinary that BJ Ball "believed that there was no dumping in the market for A4 copy paper" when the importer sold all of its APRIL imports at a loss. The prices offered by BJ Ball for APRIL A4 copy paper were clearly unfairly priced.

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The comment that the Australian market is in decline is not supported by the available data. The Australian market for A4 copy paper has remained relatively stable and is a mature market with an approximate 2 per cent growth per annum (as confirmed at Section 8.1 in Preliminary Affirmative Determination No. 341).

The reduction in AP's prices during the investigation period has been due to increased competition from dumped (and subsidized) imports of A4 copy paper from Brazil, China, Indonesia and Thailand.

AP agrees with BJ Ball's assessment that the depreciation of the Australian dollar since the beginning of 2015 should have been to the advantage of the Australian industry, however, Figures 1.2 & 3 in PAD No. 341 clearly indicate that the dumped and subsidized exports to Australia of A4 copy paper have resulted in reduced prices and margins, and a diminution in AP's profit and profitability.

It is therefore critical that the Commission ensures that interim duties are applied to injurious exports of A4 copy paper from Brazil, China, Indonesia and Thailand.

If you have any questions concerning this submission, please do not hesitate to contact me on (03) 8540 2451 or AP's representative Mr John O'Connor on (07) 3342 1921.

Yours sincerely

Matt Decarne
Trade Affairs Manager