Tim King
19th January 2017
Assistant Director | Anti-Dumping Commission
55 Collins Street, Melbourne VIC

Submission – PUBLIC RECORD VERSION

Dear Tim,

Further to the publication of the submission from Australian Paper dated 16th Jan (uploaded at later date) in response to the submission by Double A (1991) dated 23rd December (uploaded to public file on 4th Jan), please find below response from Double A (1991) in relation to the matters to be considered by the Commission.

Issue 1 – Date of Sale

Double A (1991) has already provided the commission with clear supporting evidence that at the purchase order date the terms of sale were agreed and finalised.

Issue 2 – Sustained appreciation of Thai Baht

Given the fluctuation in currency occurred after the date of purchase order placement, Double A (1991) has correctly requested the commission to compare the period of fluctuation (ie between placement of the order date and invoice date) with the eight week period that immediately proceeds the order placement date.

Issue 3 – Price Increases

Double A (1991) has provided the commission with extensive evidence of price increases (based on EQR verified data) and volume impacts.

Issue 4 – Exclusion from cumulation (as related to specific customer requirements)

Double A (1991) has provided the commission with extensive evidence which supports the position that A4 copy paper is not a homogenous product that can be used interchangeably on the Australian market due to significant specific customer requirements.

Given the commission has specifically relied on numerous substantive examples to demonstrate alleged injury to the Applicant where Double A (1991) was excluded due to specific customer requirements, there is demonstrable evidence which provides further support to the exclusion of Double A (1991) from any cumulative assessment of injury as related to specific customer requirements.

บริษัท ดั๊บเบิ้ล เอ (1991) จำกัด (มหาชน)
(ทะเบียนเลขที่ 0107537000602)
สำนักงานใหญ่ 1 หมู่ 2 ต.ท่าตูม อ.ศรีมหาโพธิ จ.ปราจีนบุรี 25140
โทร : (037) 208800-39 แฟกซ์ : (02) 6591441

DOUBLE A (1991) PUBLIC COMPANY LIMITED
Head Office 1 Moo 2, Tha Toom, Amphur Sri Maha Phote, Prachinburi 25140 Thailand
Tel : (6637) 208800-39 Fax : (662) 6591441

Issue 5 – Government Agencies Contracts

Government Agencies Contracts was specifically raised in Applicants submission dated 20th November (127) as evidence of alleged damage to Australian Industry.

Double A (1991) has demonstrated that the volume of goods supplied to government agencies with Thailand as Country of Origin is totally insignificant and therefore has not caused material damage to the Australian Industry and this provides further support to the exclusion of Double A (1991) from any cumulative assessment of injury as compared to other importers.

Issue 6 - Price Effects

Double A (1991) has clearly responded to the specific evidence provided by the Commission regarding Price Effects. The analysis confirmed that Double A (1991) has not been responsible for any injury attributed to Price Effects related to the cited evidence relied upon by the commission and therefore supports the position that Double A (1991) should be de-cumulated from any injury analysis related to Price Effects

The Applicant has provided no specific evidence to support its position that the Double A (1991) position be rejected.

The Applicant has incorrectly stated that Double A "requests the commission undertake the price undercutting analysis <u>with</u> consideration of brand type".

In its submission, Double A (1991) insists that the commission recalculate the undercutting analysis <u>without</u> categorisation according to brand type and with the inclusion of distributor margin to ensure a fair comparison of the pricing of Double A (1991) goods in 2015.

Issue 7 – Branded Products

The Applicant states that Double A's exports are "wholly interchangeable with product supplied by other exporters and the Australian Industry" whilst to date the commission has not provided Double A (1991) with a brand margin adjustment.

Double A (1991) reinterates its position that this <u>does</u> place an unfair and different condition of competition upon Double A (1991) in comparison to both the Applicant and other exporters who are able to sell manufacture branded, private label and generic goods without the requirement to cover a minimum domestic brand margin in order to participate in the Australian market.

This has also created an artificially high dumping margin for Double A (1991) goods which is not necessarily indicative of injury.

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Issue 8 – Will dumped exports from Thailand continue

The Applicant has provided no substantive evidence to support its position that Double A (1991) exports in the future may be at dumped prices which will cause further material injury to the Australian Industry.

We anticipate that the above provides sufficient information to support the position of Double A (1991) on these matters and consideration of the commission, however please advise if any further information is required.

Yours Sincerely

For and on behalf of
Double A (1991) Public Co., Ltd.

Double A
Double A (1991) Public Company Limited

Mr.Thirawit Leetavorn
Senior Executive Vice President

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