



storaenso

NON-CONFIDENTIAL

Stora Enso Wood Products Oy Ltd
Lintulahdenkuja 10
FI-00500 Helsinki
Finland

Mr Mick Kenna
Manager Operations
Customs House
5 Constitution Avenue
Canberra ACT 2601
Australia

Official Reply to the investigation into the alleged dumping of certain structural timber exported from the Republic of Austria, Canada, the Czech Republic, the Republic of Estonia, the Federal Republic of Germany, the Republic of Lithuania, Sweden and the United States of America

Dear Mr Kenna,

On 30 September 2011, we received an official letter from you regarding alleged dumping practices involving structural timber exported to Australia. Based on your requirements, we have completed the Exporter Questionnaires (hereinafter "Questionnaires") providing all required information regarding the current situation in our factories located in the Republic of Austria, the Czech Republic, the Republic of Estonia, the Federal Republic of Germany, the Republic of Lithuania and Sweden. We do not have factories in Canada or the United States of America.

I. Executive summary

Stora Enso Wood Products Business Area (hereinafter "Stora Company") operates in all the above mentioned countries. However, the products, the business strategy and the volume of exports to third countries and to Australia are different. The substantial part of our exports to Australia is from Stora Enso factories located in the Czech Republic (hereinafter "Stora Czech") and the Republic of Estonia (hereinafter "Stora Estonia"). These two countries supply XXXXX of all the timber exported by Stora Company to Australia (see Confidential appendix 1).

We understand that Australian Customs considers Stora Company to be dumping structural timber because it has allegedly exported goods (hereinafter "goods under consideration") at a price lower than the "normal value", as stated in general anti-dumping rules. We strongly believe the allegation concerning dumping activities to be without merit.

We are of the view, based on the reasons stated below, that the sale of the goods under consideration cannot be classified as a dumping practice within the Australian market. Our opinion is based on the details provided in completed Questionnaires for the relevant factories and on data received from relevant statistical offices concerning the wood market in each relevant country. Moreover, our findings are supported by the most commonly used economical indicators and cost calculations divided between production for Australia, production for third countries and for domestic sales.

Finally, we would like to point out that according to publicly available information, domestic supplies of timber in Australia are unable to meet current local demand. In such a situation imports of timber are needed to cover the gap between supply and demand in the Australian market. Imports into Australia are, therefore, beneficial in keeping activity levels high in the construction industry and in ensuring customers have better access to affordable living accommodation.

II. Definition of the goods under consideration

Based on the letter received from you we assume that the goods under consideration are timber which:

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

In the Questionnaires, as required, we have described production and sales activities which, according to our opinion, should be treated differently based on the location of the factory involved and on the type of goods in question. Individual factories of Stora Company should, we believe, be treated separately with reference to domestic sales, sales to third countries and sales of like goods to Australia. Other important factors, such as the structure of the factory, the particular manufacturing process used and the related costs of domestic production should also be taken into a consideration. The price level of sales depends on the location of the factory and on the domestic demand for the goods under consideration.

Based on the above, we have divided the Questionnaire into several independent Questionnaires which describe specific conditions for each of the Czech Republic and Estonia factories under consideration. However, we are of the view that the process of investigation into the alleged dumping activity should be aimed mainly at the factories, which provide the substantial part of the total exports by Stora Company to Australia.

III. Summary of Stora Company locations data

In this respect please find below a summary for the factories located in the Czech Republic and the Republic of Estonia.

a) Stora Czech

Stora Czech is fully concentrated on sales of the goods under consideration to Australia and to other countries XXX [list of countries]. Stora Czch does not produce or sell any goods which, for the purposes of the inquiry, may be considered as like goods with relevant characteristics. There have been only a few transactions which may be considered as a sale of like goods on the domestic market in the monitoring period, i.e. from 1 July 2010 to 30 June 2011. Given that these sales are not in sufficient volumes as required by section 269TAC (14) of the Customs Act 1901 they should not be used as a basis for determining a normal value based on domestic sales.

i) Alternative calculation of normal value for Stora Czech

To determine the normal value according to the Australian Anti-dumping and Countervailing Administration Law (hereinafter "Anti-dumping law") it is important to use methods specified in the Law. In determining the normal value for Stora Czech it is necessary to have domestic prices available, which in this particular case is problematic. The reason is that Stora Czech cannot calculate the normal value by using a representative price for like goods because there are only limited supplies of similar goods in the Czech Republic. Stora Czech produces the goods under consideration mainly for export to Australia.

In this respect, and in accordance with the Anti-dumping law, the normal price of goods can only be calculated by using the second alternative method which is the construction of a final price based on costs of production with the addition of a reasonable profit margin. We have provided several main economic indicators which show that margins in the Czech wood market as a whole were, during the investigated period, similar or even smaller than the margin achieved by Stora Czech.

ii) Economic Indicators of Stora Czech

As already stated, during the investigation period, Stora Czech sold only a limited volume of goods in the domestic market. In view of this, we are convinced that a more appropriate approach for determining a normal price is to provide additional information about the whole Czech wood market taken from independent sources. In this respect we have collected as much information as possible from the Czech Statistical Office which in our opinion best describes the situation relating to like goods in the Czech Republic (see Confidential appendix 2). This data is publicly available at the official website (www.czso.cz).

iii) Other useful economic indicators related to the case

We are of the view that other economic indicators may be useful. We, therefore, enclose 3 additional tables with data from the Czech Statistical Office covering the specific indicators helpful for comparison purposes (see appendices 3A to 3C).

b) Stora Estonia

In contrast to the Czech factory, Stora Estonia produces more products which are sold on the domestic market. Consequently, a comparison of margins and prices between the Estonian and Australian markets is applicable.

The relevant information is included in the Estonia Questionnaire enclosed with this letter.

c) Factories located in other countries

The situation in other Stora Company factories located in countries other than the Czech Republic and the Republic of Estonia is, we consider, less important since they supply far lower volumes of the goods under consideration to Australia. However, we have provided all the required information which can be found in the relevant Questionnaire.

IV. Conclusion

Based on the above, and on the supporting documents provided to you within the stipulated deadline, we are convinced that our activity in the Australian market does not represent a dumping activity. Our goal is not to harm the wood industry in Australia. Our intention has always been to operate a profitable export business to Australia which supports the Australian construction industry by making it competitive and cost effective.

Best regards,



Hannu Kasurinen

Executive Vice President, Stora Enso Wood Products

Table No. 52

Rentabilita úhrnných vložených prostředků (ROA)

Výrobce/technický zdroj	Osvětvi:	2005				2006				2007				2008				2009				2010				2011				2012				2013				2014				2015				2016				2017				2018				2019				2020				2021				2022				2023				2024				2025				2026				2027				2028				2029				2030				2031				2032				2033				2034				2035				2036				2037				2038				2039				2040				2041				2042				2043				2044				2045				2046				2047				2048				2049				2050				2051				2052				2053				2054				2055				2056				2057				2058				2059				2060				2061				2062				2063				2064				2065				2066				2067				2068				2069				2070				2071				2072				2073				2074				2075				2076				2077				2078				2079				2080				2081				2082				2083				2084				2085				2086				2087				2088				2089				2090				2091				2092				2093				2094				2095				2096				2097				2098				2099				20100				20101				20102				20103				20104				20105				20106				20107				20108				20109				20110				20111				20112				20113				20114				20115				20116				20117				20118				20119				20120				20121				20122				20123				20124				20125				20126				20127				20128				20129				20130				20131				20132				20133				20134				20135				20136				20137				20138				20139				20140				20141				20142				20143				20144				20145				20146				20147				20148				20149				20150				20151				20152				20153				20154				20155				20156				20157				20158				20159				20160				20161				20162				20163				20164				20165				20166				20167				20168				20169				20170				20171				20172				20173				20174				20175				20176				20177				20178				20179				20180				20181				20182				20183				20184				20185				20186				20187				20188				20189				20190				20191				20192				20193				20194				20195				20196				20197				20198				20199				20200				20201				20202				20203				20204				20205				20206				20207				20208				20209				20210				20211				20212				20213				20214				20215				20216				20217				20218				20219				20220				20221				20222				20223				20224				20225				20226				20227				20228				20229				20230				20231				20232				20233				20234				20235				20236				20237				20238				20239				20240				20241				20242				20243				20244				20245				20246				20247				20248				20249				20250				20251				20252				20253				20254				20255				20256				20257				20258				20259				20260				20261				20262				20263				20264				20265				20266				20267				20268				20269				20270				20271				20272				20273				20274				20275				20276				20277				20278				20279				20280				20281				20282				20283				20284				20285				20286				20287				20288				20289				20290				20291				20292				20293				20294				20295				20296				20297				20298				20299				20300				20301				20302				20303				20304				20305				20306				20307				20308				20309				20310				20311				20312				20313				20314				20315				20316				20317				20318				20319				20320				20321				20322				20323				20324				20325				20326				20327				20328				20329				20330				20331				20332				20333				20334				20335				20336				20337				20338				20339				20340				20341				20342				20343				20344				20345				20346				20347				20348				20349				20350				20351				20352				20353				20354				20355				20356				20357				20358				20359				20360				20361				20362				20363				20364				20365				20366				20367				20368				20369				20370				20371				20372				20373				20374				20375				20376				20377				20378				20379				20380				20381				20382				20383				20384				20385				20386				20387				20388				20389				20390				20391				20392				20393				20394				20395				20396				20397				20398				20399				20400				20401				20402				20403				20404				20405				20406				20407				20408				20409				20410				20411				20412				20413				20414				20415				20416				20417				20418				20419				20420				20421				20422				20423				20424				20425				20426				20427				20428				20429				20430				20431				20432				20433				20434				20435				20436				20437				20438				20439				20440				20441				20442				20443				20444				20445				20446				20447				20448				20449				20450				20451				20452				20453				20454				20455				20456				20457				20458				20459				20460				20461				20462				20463				20464				20465				20466				20467				20468				20469				20470				20471				20472				20473				20474				20475				20476				20477				20478				20479				20480				20481				20482				20483				20484				20485				20486				20487				20488				20489				20490				20491				20492				20493				20494				20495				20496				20497				20498				20499				20500				20501				20502				20503				20504				20505				20506				20507				20508				20509				20510				20511				20512				20513				20514				20515				20516				20517				20518				20519				20520				20521				20522				20523				20524				20525				20526				20527				20528				20529				20530				20531				20532				20533				20534				20535				20536				20537				20538				20539				20540				20541				20542				20543				20544				20545				20546				20547				20548				20549				20550				20551				20552				20553				20554				20555				20556				20557				20558				20559				20560				20561				20562				20563				20564				20565				20566				20567				20568				2056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Appendix 3B - ROE

Return on equity (ROE)

Table No.53

	Ocenění	Return on equity (ROE)					CZ-NACE		
		2005	2006	2007	2008	2009	Rozdíl rozdílu	Rozdíl rozdílu	Rozdíl rozdílu
		2005-2007	2006-2005	2007-2006	2008-2007	2008-2005	2005-2007	2007-2006	2008-2005
Příjmy z celém		12,30	13,49	16,37	12,59	10,57	1,19	2,88	-2,02
B) Výroba a obdoby	13,40	13,83	15,96	17,03	9,56	0,89	2,08	1,07	7,47
C) Zpracovávané průmysly	13,97	15,84	17,36	10,84	7,85	1,87	1,92	-6,72	42,73
z toho:									
Výroba potravných výrobků	9,73	8,41	11,21	9,58	12,22	-1,37	2,80	-1,63	2,65
Výroba papíru	17,43	14,42	16,11	11,15	10,94	-3,0	1,69	-4,96	-42,1
Výroba textilu	5,27	3,01	9,24	1,27	4,95	-3,26	6,23	7,91	3,69
Výroba oděvů	7,77	18,82	20,77	18,58	4,58	35,16	11,06	2,04	-16,28
Výroba i užití a spracování výrobků	13,17	20,62	21,38	11,69	23,59	7,45	0,96	-9,90	11,90
Zpracování dřeva, výroba dřevěných, kovových průmyslových a sládkových výrobků, kr. nábytku	20,87	27,97	30,02	20,61	15,86	7,13	2,06	-9,41	-4,75
Výroba plátna a výroba z papíru	14,75	17,73	14,99	9,27	8,68	-3,22	3,25	-5,72	-0,58
Tisk a rozmnožování: paragrafické	21,78	22,86	19,79	24,12	19,68	1,08	-3,07	4,33	-4,45
Výroba strojů a zdrojů výrobních nebo podobných produktů	3,92	3,91	4,08	4,71	4,60	-0,61	0,18	0,63	-9,31
Výroba chemických látek a chemických přípravků	12,12	10,77	11,11	4,49	1,90	-1,35	0,34	-6,61	-2,60
Výroba žárových lamp, elektrotechnických výrobků a lampových přístrojů	13,22	15,27	13,89	24,13	3,25	1,95	-1,57	10,44	-22,88
Výroba hydraulických, pneumatických výrobků	15,65	15,89	9,13	11,59	15,35	0,22	2,24	6,54	3,76
Výroba instalací, sekvenčních, mimořádných výrobků	13,03	14,70	22,03	12,42	6,38	1,71	8,23	-10,51	-1,04
Výroba základních kong. hliníku zpracovaných kovů, sloužících k výrobě konstrukcí a kovových výrobků, kr. strojů a zařízení	14,73	18,37	16,66	7,86	2,93	3,62	0,29	-10,80	-12,81
Výroba podlah, elektronických a optických přístrojů a zařízení	21,00	20,89	22,35	16,89	11,35	-0,12	1,46	-5,46	-5,54
Výroba elektřiny, vodovodu, kanalizace, teploměření	8,04	23,96	15,04	18,49	33,99	15,92	-29,00	-13,45	15,51
Výroba elektřiných zařízení	16,90	17,61	20,89	13,52	13,05	0,71	3,28	-7,37	-0,48
Výroba strojů a zařízení, in.	12,39	14,39	18,19	11,83	8,83	4,01	4,40	-6,96	3,00
Výroba provozních vozidel (kr. motorových), přívěsu a návěsů	14,26	17,37	17,35	7,64	4,67	3,12	-0,02	-5,71	-2,97
Výroba elektrických opravnicích prostředků a zařízení	46,72	28,77	23,69	3,35	24,44	77,95	52,47	-20,35	21,10
Výroba oděvů	19,36	14,70	16,79	15,30	11,73	-4,68	2,09	-1,49	-3,58
Ostatní průmyslové výrobky	19,21	23,86	20,91	19,01	20,31	4,65	-2,56	-1,90	-1,30
D) Výroba a ovoř. elektřiny, plynu, top. a klimatizovaného vzduchu	9,50	9,86	15,65	17,23	16,83	0,36	5,79	1,57	-0,40
E) Zásobování vodou: činnosti související s odpadními vodami, odpady a sanacemi	4,60	5,76	7,13	6,77	5,75	1,15	1,37	-0,36	-1,02

Notes:
Abs = industry average defined in accordance with the "Trade Union Act - Czech Republic".

Zároveň byly použity počítací hodnoty zpracování výroby a zařízení.

Poznámka

