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Director – Investigations 2
Anti-Dumping Commission
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Public File

Continuation 617 – Steel pallet racking exported from the People’s Republic of China, and Malaysia

1. Introduction

Dematic Pty Limited (**Dematic**) is an Australian manufacturer of adjustable steel pallet racking (**pallet racking and/or the goods**), and was the applicant company that requested the above-noted continuation inquiry (**CON 617**) – refer ADN No. 2023/021. Dematic makes the following submission in relation to the ongoing prevalence of subject goods imports, the material injury suffered in relation thereto, and recent representations made by interested parties.

2. Australian industry continues to suffer from materially injurious imports

Dematic provides at Confidential Attachment 1 ongoing evidence of the injurious impact of steel palling racking imports from the subject countries on the Australian industry. Specifically, Dematic [**confidential text deleted** – *material injury details*]. In summary:

[**confidential table deleted** – *material injury details summary*]

3. Border Force Compliance Update

As detailed in Dematic’s continuation application for the measures in question, evidence of subject exporters maintaining distribution links into the Australian market comes in the form of, inter alia, the Australian Border Force (**ABF**) focus on trade remedy compliance activities. Following imposition of the measures, imports of pallet racking have been the subject of numerous ABF compliance assessments. These were communicated by the ABF in the October 2020,¹ February 2021,² Autumn 2021,³ August 2021,⁴ Spring 2021,⁵ and Autumn 2022⁶ Compliance Updates.

Dematic has [**confidential text deleted** – *compliance details and Dematic’s interested party assessment*]. The public record to-date has comprised two interested party submissions, neither of which relate to questionnaire responses. The

¹ Australian Border Force Goods Compliance Update – October 2020, p. 26.

² Australian Border Force Goods Compliance Update – February 2021, p. 28.

³ Australian Border Force Goods Compliance Update – Autumn 2021, p. 22.

⁴ Australian Border Force Goods Compliance Update – August 2021, p. 33.

⁵ Australian Border Force Goods Compliance Update – Spring 2021, p. 33.

⁶ Australian Border Force Goods Compliance Update – Autumn 2022, p. 28.

Anti-Dumping Commission (**the Commission**) has also published a Response to Exporter Questionnaire (**EQR**) Status file note,⁷ where it noted the granting of EQR deadline extensions for certain Chinese and Malaysian exporters.

The decline in interested party engagement between the original inquiry (**INV 441**) and CON 617 may present as a lagging indicator of the prevalence of non-compliance over the course of the measures, and a possible leading indicator into ongoing/future instances of non-compliance. In the interests therefore of ensuring compliance to the established trade measures, and potential identification of circumvention activity, Dematic [**confidential text deleted** – *compliance details*].⁸ Dematic requests that the Commission [**confidential text deleted** – *compliance assessments*].

4. Interested party information not provided

An interested party to CON 617 has made representations claiming [**confidential text deleted** – *Dematic's commercially sensitive assessment of interested party claims, and implications for the continuation inquiry*].

Should you have any queries in relation to this submission, please don't hesitate to contact either myself on the above-signed, or Dematic's trade advisor Mr Chad Uphill on 0412 377 603.

Yours sincerely,



Alan Lamb
Company Secretary
Dematic Pty Ltd

⁷ Folio No. 5.

⁸ Refer Confidential Attachment 2.