

24 July 2023

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

Safer Storage Systems (**SSS**) is an Australian manufacturer of adjustable steel pallet racking (**pallet racking** and/or **the goods**) and makes this submission in relation to the above-noted continuation inquiry (**CON 617**) – refer ADN No. 2023/021. SSS welcomes the initiation and progress made to-date by the Australian Anti-Dumping Commission (**the Commission**) on CON 617, and submits that sufficient evidence exists for the Commission to conclude that the expiration of the measures would likely lead to a continuation or recurrence of dumping of the goods exported to Australia from China and Malaysia.

2. About Safer Storage Systems

SSS is an Australian Manufacturer of pallet racking systems, that commenced operations in 2006. Located in Dandenong South, Melbourne, SSS is [**confidential text deleted – ownership details**].

SSS had been [**confidential text deleted – history of business operations, and current operations**].

SSS directly employs seventy-plus people in its Australian office, production and installation functions. SSS estimates that the number of indirect Australian suppliers and contractors is a multiple of two-four times. SSS are pursuing a Carbon Neutral and ultimately a Net Zero manufacturing capability.

3. Assessment of the Australian competitive pallet racking landscape

Following imposition of the measures, SSS observed a rapid export pattern-of-trade shift vis-à-vis Chinese pallet racking exports to Australia – in brief, Chinese export volumes substantially declined with a corresponding increase from South-East Asian countries. In relation to Malaysia, it has continued to export similar volumes of the subject goods to Australia, notwithstanding the measures.

SSS submits that [**confidential text deleted – China/Malaysia exporter relationship assessment**]. This undercuts, to a material degree, SSS’s selling prices in the Australian market.

To further corroborate this claim, SSS is aware that [**confidential text deleted – Malaysian manufacturer/exporter assessment**].

SSS provides at Confidential Attachment 1 [**confidential text deleted – Malaysian price undercutting details**].

Confidential Attachment 1 details a substantial difference between Malaysian and Australian manufactured pallet racking [**confidential text deleted** – *Malaysian price undercutting details*]. At Confidential Attachment 2 [**confidential text deleted** – *Malaysian price undercutting details*].

4. The Australian industry applicants' claim for measures continuation

SSS has reviewed the continuation application made by Dematic Pty Limited (**the Australian industry applicant**), and all subsequent material published on the Commission's electronic public record. SSS fully supports the Australian industry applicant in its position that, in the absence of continued trade measures against China and Malaysia, these subject countries will revert to and continue to cause material injury to the Australian pallet racking industry.

SSS submits that [**confidential text deleted** – *business specific impact of measures removal*].

5. Conclusion

SSS submits that the likely deleterious impact of pallet racking imports from the subject countries on the domestic Australian industry would be significant if the anti-dumping measures are allowed to expire. SSS would welcome further engagement with the Commission on this matter, and will make further representations as-and-when required during the course of CON 617.

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

Kind regards,



Matthew Bell
Managing Director – Safer Storage Systems