



**Gunns™
TIMBER
PRODUCTS**

PUBLIC FILE

177

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19th January 2012

Mr Justin Wickes
National Manager
International Trade Remedies Branch
Australian Customers and Border Protection Service
Customers House
5 Constitution Avenue
CANBERRA ACT 2601

Dear Mr Wickes

Trade Measures Inquiry No.176 – Structural Timber exported from Austria, Canada, the Czech Republic, Estonia, Germany, Lithuania, Sweden and the USA

We are writing this letter to convey our concerns with respect to how some of the complexities of this Application are being managed by ACBPS and seeking to clarify our previous understanding of how some of these complexities would be dealt with by ACBPS to ensure understanding and correct interpretation.

Respectfully, given ACBPS's limited experience and expertise with regards to sawmilling accounting approaches, we are firmly of the view that the above Application warrants the use of an industry expert to independently review materials resulting from the Exporter visits prior to their finalisation, calculation of dumping margins and publication to the public file. We believe that this would be an approach that is consistent with recently announced Ministerial reforms to the dumping investigation process.

Whilst it was our understanding that ACBPS were going to engage said expert, the current impression based on communications from ACPBS to the applicant companies is that ACBPS appear to have retreated from this position.

We seek clarification of ACBPS's position on this and a response that hopefully addresses how the complexities and risk of misinterpretations or misunderstandings with respect to the exporter visit reports will be managed.

Yours sincerely

CHRISTINE BRIGGS
General Manager Sales & Marketing