



J.BRACIC & ASSOCIATES
TRADE REMEDY ADVISORS

PO Box 3026
Manuka, ACT 2603
Mobile: +61 499 056 729
Email: john@jbracic.com.au
Web: www.jbracic.com.au

4 February 2020

Director Operations 1
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

**Dumping investigation into High density polyethylene
from Korea, Singapore, Thailand, USA**

Dear Director

This submission is made on behalf of the Martogg Group of Companies (Martogg), in response to the Anti-Dumping Commission's (the Commission) findings outlined in Statement of Essential Facts Report No. 515 (SEF 515) on 15 January 2020.

Martogg fully supports the Commission's findings in SEF 515 as it relates to USA and the proposed decision to terminate the investigation. The finding and decision to terminate the investigation on the basis of negligible import volumes from the USA is consistent with Martogg's confirmed import volumes and its understanding of overall imports from the subject countries. Martogg therefore urges the Commission to terminate the investigation in so far as it relates to the USA promptly.

Notwithstanding the negligible USA import volumes and the preliminary dumping margins established for USA exporters, Martogg contends that the material injury issues raised in its submission of 19 July 2019 remain relevant. That is, that any claimed injury by Qenos is almost exclusively caused by broader domestic and company specific circumstances.

In summary these include:

- capacity constraints resulting in introduced allocations and offers of HDPE imports;

PUBLIC VERSION

- sharp increase in gas costs making Qenos less competitive against import sources; and
- Qenos prices are benchmarked to South East Asian regional prices which has prevented them from reflecting increased gas costs in its selling prices;

Each of these factors, which are unconnected to USA imports, have contributed to the situation facing Qenos.

Martogg repeats its request that the investigation, in so far as it relates to the USA, be terminated immediately.

Yours sincerely

John Bracic