



Australian Government
Department of Industry, Science,
Energy and Resources

Anti-Dumping Commission

Exporter Questionnaire

Case number: 548

Product: Certain kraft paperboard

From: the United States of America

Investigation period: 1 January 2018 to 31 December 2019 (the period)

Response due by: 6 May 2020

Return completed questionnaire to: investigations3@adcommission.gov.au

Anti-Dumping Commission website: www.adcommission.gov.au

TABLE OF CONTENTS

TABLE OF CONTENTS	2
INSTRUCTIONS	3
CHECKLIST	6
GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES	7
SECTION A COMPANY INFORMATION	9
A-1 COMPANY REPRESENTATIVE AND LOCATION	9
A-2 COMPANY INFORMATION	9
A-3 GENERAL ACCOUNTING INFORMATION	12
A-4 FINANCIAL DOCUMENTS	14

INSTRUCTIONS

Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the Commission) is conducting an investigation into certain kraft paperboard exported to Australia from the United States of America (USA).

The Commission will use the information you provide to determine normal values and export prices over the investigation period (the period). This information will determine whether kraft paperboard is dumped.

If you do not manufacture the goods

If you play a role in the export of the goods but do not produce or manufacture the goods (for example, you are a trading company, broker, or vendor dealing in the goods), it is important that you forward a copy of this questionnaire to the relevant manufacturers and inform the Commission of the contact details for these manufacturers **immediately**.

The Commission will still require your company to complete this exporter questionnaire except Section G – Cost to make and sell.

What happens if you do not respond to this questionnaire?

You do not have to complete the questionnaire. However, if you do not respond, do not provide all of the information sought, do not provide information within a reasonable time period, or do not allow the Commission to verify the information, we may deem your company to be an uncooperative exporter. In that case the Commission must determine a dumping margin having regard to all relevant information.

Therefore, it is in your interest to provide a complete and accurate response to this exporter questionnaire, capable of verification.

Extension requests

If you require a longer period to complete your response to this exporter questionnaire, you must submit a request to the Commission, in writing, for an extension to the due date for all or part of the questionnaire. This request must be made prior to the due date. A request for extension will be rejected if received after the due date.

When considering the extension request, the Commission will have regard to:

- the Commission's responsibility to conduct the case in a timely and efficient manner;
- the reasons why you could not provide a response within the whole period and not only the period remaining between the request and the due date;
- ordinary business practices or commercial principles;
- the Commission's understanding of the relevant industry;
- previous correspondence and previous dealings with your company; and
- information provided by other interested parties.

More information on extensions can be found in the Customs (Extension of Time and Non-cooperation) Direction 2015 at <https://www.legislation.gov.au/Details/F2015L01736>.

You will be informed of the decision whether your request for an extension has been rejected, granted in full or granted in part. For example, you may be granted an extension to submit all sections except for Section A or you may be granted a shorter extension than you requested.

A summary of any requests and grants of extensions to submit a response to this exporter questionnaire will be published in the public record.

PUBLIC RECORD

Submitting a response to the exporter questionnaire

Responses to the exporter questionnaire should be lodged by email listed on the cover page. In submitting the response to the exporter questionnaire, you must answer all questions, include all attachments and spreadsheets, and provide a non-confidential version of your response to this exporter questionnaire.

If your response to this exporter questionnaire contains major deficiencies that, in the Commissioner's view, cannot be quickly and easily rectified in a further response, then your company may be deemed as an uncooperative exporter.

Confidential and non-confidential responses

You are required to lodge a confidential version (for official use only) and a non-confidential version (for public record) of your response to this exporter questionnaire by the due date. Please ensure that *each page* of information you provide is clearly marked either "FOR OFFICIAL USE ONLY" or "PUBLIC RECORD".

All information provided to the Commission in confidence will be treated accordingly. The public record version of your questionnaire will be placed on the public record, and must contain sufficient detail to allow a reasonable understanding of the substance of the information, but does not breach confidentiality nor adversely affect those interests.

A person is not required to provide a summary for the public record if the Commission can be satisfied that no such summary can be given that would allow a reasonable understanding of the substance of the information.

All questionnaires are required to have a bracketed explanation of deleted or blacked out information for the public record version of the questionnaire. An example of a statement to accompany deleted/blacked out text is:

[Explanation of cost allocation through the divisions, by reference to machine hours or weight].

If such an explanation is not provided, the Commission may disregard the information in the submission. Where the public record version of your response to the exporter questionnaire does not contain sufficient detail, your company may be deemed to have significantly impeded the case and be deemed an uncooperative exporter.

Verification of the information that you supply

IMPORTANT: On 20 March 2020, the Commission published *Anti-Dumping Notice No. 2020/029*,¹ advising that onsite exporter verification activities have been temporarily suspended until further notice as a result of the COVID-19 pandemic.

The Commission remains committed to ensuring that the data submitted is complete, relevant and accurate and may elect to undertake alternatives. This includes but is not limited to remote verification, desktop assessments or delaying verification activities until such time as onsite verification is possible. The Commission will continue to monitor current events and assess when the suspension of onsite exporter verification activities can be lifted.

The Commission may wish to conduct a visit, if this option becomes available to the Commission, to your company to verify your questionnaire response for completeness, relevance and accuracy of the information to your company's records.

¹ [https://www.industry.gov.au/sites/default/files/adcd/public-record/notice_adn - adn 2020-029 - temporary_suspension_of_international_onsite_verification_0.pdf](https://www.industry.gov.au/sites/default/files/adcd/public-record/notice_adn_-_adn_2020-029_-_temporary_suspension_of_international_onsite_verification_0.pdf)

PUBLIC RECORD

The verification visit, or any verification activity is not meant to be a chance for you to provide new or additional information. The Commission expects your response to the questionnaire to be relevant, complete and accurate.

Onsite verification is usually conducted over 4 days, remote and desktop verification may take a longer period of time. In complex cases, a verification visit, if conducted, may be scheduled over 5 days. A desktop verification may require a longer period.

Any verification activity will include a detailed examination of your company's records and we will collect copies of relevant documents. The verification will require the participation of key staff, including your financial accountant, production manager and sales staff. A tour of the manufacturing facility, should an onsite visit be possible, may also be required during the verification visit.

Note that the Commission may disregard any data or information that is not verified, including new or additional information provided after the verification activity.

A report will be prepared following the verification activity, which details the outcomes of the verification. This report will be placed on the public record and may include the publication of the preliminarily-assessed dumping margin. The Commission considers that the dumping margin is not confidential information, but rather an aggregate figure derived from confidential data.

You will be provided with an opportunity to comment on the accuracy and confidentiality of the verification report prior to its publication on the public record.

For information on the Commission's verification procedures, refer to Anti-Dumping Notice No. 2016/30 available on the Commission's website.

Important instructions for preparing your response

- All questions in this exporter questionnaire must be completed. If a question is not applicable to your situation, please answer the question with "Not Applicable" and provide an explanation as to why.
- All questions must be answered in English. An English translation must be provided for documents not originally in English.
- Clearly identify all units of measurement (e.g. KG) and currencies (e.g. AUD) used. Apply the same measurement consistently throughout your response to the questionnaire.
- Label all attachments to your response according to the section of the questionnaire it relates to (e.g. label the chart of accounts as Attachment A-4.6)
- The data must be created as spreadsheet files in Microsoft Excel.
- If you have used formulas to complete spreadsheets, these formulas must be retained and not hard-coded.
- You must retain all worksheets used in answering the questionnaire. Be prepared to provide these worksheets during the Commission's verification of your data.
- If you cannot present electronic data in the requested format contact the case officer as soon as possible.
- Where possible, electronic data should be emailed or shared with the Commission via SIGBOX, a secure online document repository. Please contact the Commission to request access to SIGBOX if required.

CHECKLIST

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please tick if you have responded to all questions
Section A Company information	X
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
Non-confidential version of this response	X

Attachments	Please tick if you have provided spreadsheet
B-2 Australian sales	<input type="checkbox"/>
B-4 Upwards sales	<input type="checkbox"/>
B-5 Upwards selling expenses	<input type="checkbox"/>
D-2 Domestic sales	<input type="checkbox"/>
F-2 Third country sales	<input type="checkbox"/>
G-3 Domestic CTM	<input type="checkbox"/>
G-4.1 SG&A listing	<input type="checkbox"/>
G-4.2 Dom SG&A calculation	<input type="checkbox"/>
G-5 Australian CTM	<input type="checkbox"/>
G-7.2 Raw material CTM	<input type="checkbox"/>
G-7.4 Raw material purchases	<input type="checkbox"/>
G-8 Upwards costs	<input type="checkbox"/>

GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES

The goods under consideration (the goods) i.e. the goods exported to Australia, allegedly at dumped prices, are:

Kraft paperboard, coated on one side with clay or other inorganic substances, grammage 360-430 grams per square metre (GSM),² wet strength treated.

Further information

The goods have an end use for packaging 12 or more beverage can multipacks. The goods are an intermediate product that is converted into a final product in Australia. The conversion process will generally involve printing, cutting and gluing the imported products to create individual packaging known as beverage can multipacks. The goods do not include finished ready for sale beverage can multipacks.

Paperboard is usually imported in large rolls and is a solid paper-based product, consisting of one or more layers. Kraft paperboard primarily uses virgin softwoods in the initial pulping process, rather than a substantive use of recycled material.

Clay or other inorganic substances refers to the application of kaolin clay, calcium carbonate or other inorganic substance, to the top layer of the paperboard, allowing for high quality printing on the goods.

The grammage range of 360-430 GSM distinguishes the goods from other imported goods that may have applications in food and beverage can multipacks (e.g. packaging designed for lightweight or heavy food or beverages).

Wet strength treatment distinguishes the goods from paperboard varieties used for non-beverage can multipacks. As beverages are frequently stored in refrigerated environments additional moisture resistant properties are required for shape retention and to minimise the tear and collapse of packaging. These properties are achieved by the addition of certain chemicals.

Model Control Code

The Commission does not propose a model control code (MCC) structure at the outset of this investigation, however may implement an MCC structure if considered necessary. The Commission welcomes submissions with respect to an MCC structure.

Details of a MCC structure, suggested for the goods, should be detailed in the table below.

Category	Sub-category	Identifier	Sales Data	Cost data
[Category]	[Sub-category] [Sub-category]		Level recorded in sales data	Level recorded in cost data
[Category]	[Sub-category] [Sub-category]		Level recorded in sales data	Level recorded in cost data
[Category]	[Sub-category] [Sub-category]		Level recorded in sales data	Level recorded in cost data

² Grammage refers to the mass per unit area of all types of paper and paperboard.

PUBLIC RECORD

If the Commission considers it necessary to implement an MCC, the MCCs will be used to model match export models to the identical or comparable domestic models. In addition, the MCCs will be used to determine the profitability of domestic sales in the ordinary course of trade test by comparing domestic selling prices to the corresponding cost to make and sell. The MCC may also be used to compare the export price to the cost to make the exported model as part of the constructed normal value.

SECTION A COMPANY INFORMATION

A-1 Company representative and location

1. Please nominate a contact person within your company:

Name: Lauren S Tashma

Position in the company: EVP, General Counsel and Secretary

Telephone: 770 240 7699

E-mail address: lauren.tashma@graphicpkg.com

2. If you have appointed a representative, provide their contact details:

Name: David Peters, Kinsman Legal

Address: 54 Bunbury Street, Footscray, VIC 3011

Telephone: 61 434 242 594

E-mail address: david.peters@kinsmanlegal.com

In nominating a representative, you are granting authority to the Commission to discuss matters relating to the case with the nominated representative, including your company's confidential information.

3. Please provide the location of the where the company's financial records are held.

[1500 Riveredge Pkwy Suite 100, Atlanta, GA 30328, United States](#)

4. Please provide the location of the where the company's production records are held.

The goods are manufactured at two paper mills located in the United States at:

- [100 Graphic packaging International Way, Macon, GA 31206](#); and
- [1000 Jonesboro Rd, West Monroe, LA 71294](#).

Corresponding production records are held at those locations.

A-2 Company information

1. What is the legal name of your business?

[Graphic Packaging International, LLC. \(GPIL\)](#)

2. Does your company trade under a different name and/or brand? If yes, provide details.

No

3. Was your company ever known by a different legal and/or trading name? If yes, provide details

[GPIL has been trading under this name since 1 January 2018.](#)

4. Provide a list of your current board of directors and any changes in the last two years.

[Current Board of Directors of parent company \(changes in the last two years noted parenthetically\)](#)

[Laurie Brlas \(since 11 January 2019\)](#)

[David Campbell](#)

[Paul Carrico](#)

PUBLIC RECORD

Michael Doss
Robert Hagemann
Philip Martens
Dean Scarborough (since 27 July 2018)
Larry Venturelli
Lynn Wentworth

Directors who are no longer with the board, but were on Board during last two years:

Peter Kelly (resigned 16 August 2018)

5. Is your company part of a group (e.g. parent company with subsidiaries, common ownership, joint-ventures)?

GPIL is a subsidiary of Graphic Packaging Holding Company (GPHC).

If yes, provide:

- (a) A diagram showing the complete ownership structure; and
- (b) A list of all related companies and its functions

Please see pages 5-6 of the Annual Report on Form 10K filed by GPHC.

See:

<https://www.sec.gov/ix?doc=/Archives/edgar/data/1408075/000140807520000009/gpk-20191231.htm>

Please let us know if there are any issues accessing the information at this link.

6. Is your company or parent company publically listed?

If yes, please provide:

- (a) The stock exchange where it is listed; and
- (b) Any principle shareholders³

If no, please provide:

- (a) A list of all principal shareholders and the shareholding percentages.

GPHC is publicly traded on the New York Stock Exchange. See pages 5-6 of its Annual Report on Form 10K for a summary of ownership structure (see link at question 5).

7. What is the overall nature of your company's business? Include details of the products that your company manufacture and sell and the market your company sells into.

GPIL is a leading provider of paper-based packaging solutions for a wide variety of products to food, beverage, foodservice and other consumer products companies. GPIL operates on a global basis, is one of the largest producers of folding cartons in the United States and holds leading market positions in coated recycled board, coated unbleached kraft paperboard and solid bleached sulfate paperboard.

³ Principal shareholders are those who are able to cast, or control the casting of, 5% or more of the maximum amount of votes that could be cast at a general meeting of your company.

PUBLIC RECORD

8. If your business does not perform all of the following functions in relation to the goods under consideration, then please provide names and addresses of the companies which perform each function:
- (a) produce or manufacture;
 - (b) sell in the domestic market;
 - (c) export to Australia; and
 - (d) export to countries other than Australia.

Not applicable. GPIL performs all of the above functions in relation to the goods

9. Provide your company's internal organisation chart.

Attached **confidential** file.

10. Describe the functions performed by each group within the organisation.

As reflected by the organization chart, there are a number of functional areas within the Company.

Strategy and Business Development: Responsible for working with the leadership team on developing long range strategy initiatives for growth, both organically and through M&A transactions.

EMEA: Responsible for the Company's converting and sales operations in Europe, the Middle East and Africa. Currently, the Company has operations in the UK, Belgium, Italy, France, Germany, the Netherlands and Spain.

Americas: Responsible for the Company's converting and sales operations across North America.

PAC RIM: Responsible for the Company's operations across Asia, including Japan and China.

Legal: Responsible for the Company's legal, governance and compliance functions.

Mills: Responsible for the Company's 9 paper mills which are located in the US and Canada.

Supply Chain: Responsible for the Company's supply chain organization which includes global procurement, logistics and technical support.

HR: Responsible for talent acquisition and development, labor relations, compensation and benefits, human resources information services and employee operations.

CFO: Responsible for financial planning and analysis, investor relations, information technology, treasury, Australia oversight, internal audit, accounting and financial reporting.

11. Does your company produce brochures, pamphlets or other promotional material? If yes, please provide them.

[confidential product information]
Attached **confidential** files.

A-3 General accounting information

1. What is your financial accounting period?

Calendar Year

2. Are your financial accounts audited? If yes, who is the auditor?

For the period in question, Ernst & Young (through December 31, 2019) and Price Waterhouse Coopers (for the period January 1, 2020 to present)

3. What currency are your accounts kept in?

US dollars. Local plants in other countries keep their books in local currency.

4. What is the name of your financial accounting system?

[Confidential accounting system details]

5. What is the name of your sales system?

[Confidential sales system details]

6. What is the name of your production system?

[Confidential production system details]

7. If your financial accounting, sales and production systems are different, how do the systems interact? Is it electronically or manual? Please provide a detailed explanation and include diagrams.

[Confidential system interaction details]

8. Do your accounting practices differ in any way from the generally accepted accounting principles in your country? If yes, please provide details.

No, our accounting practices are based on US GAAP.

9. Have there been any changes to your accounting practices and/or policies over the last two years? If yes, please provide details.

Yes, there have been some changes to accounting policies in response to recent accounting pronouncements.

Specifically, page 57 of GPHC's recently filed 2019 Report on Form 10K states:

Adoption of New Accounting Standards Effective January 1, 2019, the Company adopted Accounting Standards Update ("ASU") No. 2017-12, Derivatives and Hedging (Topic 815); Targeted Improvements to Accounting for Hedging Activities. The amendments in this ASU better align the risk management activities and financial reporting for these hedging relationships through changes to both the designation and measurement guidance for qualifying hedging relationships and presentation of hedge results. The adoption of this standard did not have a material impact on the Company's financial position, results of operations and cash flows. Effective January 1, 2019, the Company adopted ASU No. 2018-02, Income Statement - Reporting Comprehensive Income (Topic 220): Reclassification of Certain Tax Effects from Accumulated Other Comprehensive Income. The amendment allows a reclassification from accumulated other comprehensive income to retained earnings for stranded tax effects resulting from the 2017 Tax Cuts and

PUBLIC RECORD

Job Act ("The Act"). The Company adopted the amendment effective January 1, 2019 and elected not to reclassify the income tax effects of The Act from other comprehensive income to retained earnings. The Company's policy with respect to stranded income tax effects in accumulated other comprehensive loss is to release these effects using the aggregate portfolio approach. In February 2016, the FASB issued ASU No. 2016-02, Leases (Topic 842) ("ASC 842"). The amendments in this ASU require an entity to recognize a right-of-use asset and lease liability for all leases with terms of more than 12 months. Recognition, measurement and presentation of expenses will depend on classification as a finance or operating lease. The amendments also require certain quantitative and qualitative disclosures about leasing arrangements. The Company adopted ASC 842 effective January 1, 2019, prospectively. The adoption of this standard had a material impact on the Company's financial position, with no material impact on the results of operations and cash flows (see "Note 6 - Leases"). In January 2017, the FASB issued ASU No. 2017-04, Intangibles - Goodwill and Other (Topic 350); Simplifying the Test for Goodwill Impairment which simplifies how an entity is required to test goodwill for impairment by eliminating Step 2 of the goodwill impairment model. Step 2 measures a goodwill impairment loss by comparing the implied value of a reporting unit's goodwill with the carrying amount of that goodwill. An entity would recognize an impairment charge for the amount by which the carrying amount of a reporting unit exceeds its fair value; however, the loss recognized is limited to the amount of goodwill allocated to that reporting unit. The Company adopted the amendment effective October 1, 2019. The adoption of this standard did not have an impact on the Company's financial position, results of operations and cash flows.

In addition, page 56 of GPHC's 2018 Report on Form 10K states:

Adoption of New Accounting Standards Effective January 1, 2018, the Company adopted Accounting Standards Update ("ASU") No. 2017-09, Compensation - Stock Compensation (Topic 718); Scope of Modification Accounting. The amendments in this ASU provide guidance that clarifies when changes to the terms or conditions of a share-based payment award must be accounted for as modifications. If the value, vesting conditions or classification of the award changes, modification accounting will apply. The adoption of this standard did not have a material impact on the Company's financial position, results of operations and cash flows. Effective January 1, 2018, the Company adopted ASU No. 2017-07, Compensation - Retirement Benefits (Topic 715); Improving the Presentation of Net Periodic Pension Cost and Net Periodic Postretirement Benefit Cost. The amendments in this ASU require the service cost component of net periodic benefit cost be reported in the same income statement line or lines as other compensation costs for employees. The other components of net periodic benefit cost are required to be reported separately from service costs and outside a subtotal of income from operations. Only the service cost component is eligible for capitalization. The adoption of this ASU was applied retrospectively for the reclassification of net periodic benefit expense, excluding service costs, in the Consolidated Statement of Operations. The adoption of this ASU did not have a material impact on the Company's financial position, results of operations and cash flows. Effective January 1, 2018, the Company adopted ASU No. 2017-01, Business Combinations (Topic 805); Clarifying the Definition of a Business. The amendments in this ASU provide guidance in evaluating whether transactions should be accounted for as acquisitions (or disposals) of assets or businesses. The definition of a business affects many areas of accounting including acquisitions, disposals, goodwill and consolidation. This ASU was adopted prospectively and did not have a material impact on the Company's financial position, results of operations and cash flows. Effective January 1, 2018, the Company adopted ASU No. 2016-15, Statement of Cash Flows (Topic 230); Classification of Certain Cash Receipts and Cash Payments. The amendments in this ASU provide guidance on how certain cash receipts and payments should be presented in the statement of cash flows and was applied retrospectively. This ASU requires the Company to classify consideration received for beneficial interest obtained for selling

PUBLIC RECORD

trade receivables as investing instead of operating activities. The retrospective impact on the Company's consolidated statement of cash flows for 2018, 2017 and 2016 was a \$1,131.2 million, \$708.7 million and \$567.4 million decrease to cash provided by operating activities and a corresponding increase to cash provided by investing activities, respectively. Effective January 1, 2018, the Company adopted ASU No. 2014-09, Revenue from Contracts with Customers (Topic 606), using the modified retrospective approach. Adoption of ASU No. 2014-09 requires that an entity recognize revenue to depict the transfer of goods or services to customers in an amount that reflects the consideration to which the entity expects to be entitled in exchange for those goods or services. The Company considered whether the adoption may require acceleration of revenue for products produced by the Company without an alternative use and when the Company would have a legally enforceable right of payment. The Company has determined that it does not have an enforceable right of payment for products produced but not yet shipped and recognizes all revenue under the point in time method. The adoption of ASU No. 2014-09 did not have a material impact on the Company's financial position, results of operations and cash flows.

A-4 Financial Documents

1. Please provide the two most recently completed annual reports and/or financial statements for your company and any other related companies involved in the production and sale of the goods.

GPHC's Annual Reports on Form 10K filed in 2020 and 2019 (for fiscal years 2019 and 2018) can be found at the following links.

<https://www.sec.gov/ix?doc=/Archives/edgar/data/1408075/000140807520000009/gpk-20191231.htm>

<https://www.sec.gov/Archives/edgar/data/1408075/000140807519000007/gpk1231201810k.htm>

Please let us know if you have any problems accessing the information at these links.

2. If the financial statements in A-4.1 are unaudited, provide for each company:
 - (a) the tax returns relating to the same period; and
 - (b) reconciliation of the revenue, cost of goods sold, and net profit before tax between the financial statements and tax returns.

Not applicable. GPIL Annual Reports are audited.

3. Does your company maintain different profit centres? If yes, provide profit & loss statements for the profit centre that the goods falls into for:
 - (a) the most recent financial year; and
 - (b) the period.

Attached **confidential** files.

4. If the period is different to your financial period, please provide:
 - (a) Income statements directly from your accounting information system covering the most recent financial period and the period; or
 - (b) Quarterly or half yearly income statements directly from your accounting system covering the most recent financial period and the period.

Not applicable.

5. Please provide a copy of your company's trial balance (in Excel) covering the period and the most recent financial year.

PUBLIC RECORD

Attached **confidential** file.

6. Please provide your company's chart of accounts (in Excel).

Attached **confidential** file.

If any of the documents are not in English, please provide a complete translation of the documents.