



Australian Government
Department of Industry,
Innovation and Science

Anti-Dumping
Commission



Application for a
review of
anti-dumping measures

A4 Copy Paper exported from the
Federated Republic of Brazil, The
People's Republic of China, The
Republic of Indonesia (excluding
exports by PT Indah Kiat Pulp & Paper
Tbk and PT Pindo Deli Pulp & Paper
Tbk), and the Kingdom of Thailand

APPLICATION UNDER SECTION 269ZA OF THE *CUSTOMS ACT 1901* FOR A REVIEW OF ANTI-DUMPING MEASURES

In accordance with section 269ZA of the *Customs Act 1901* (the Act), I request that the Anti-Dumping Commissioner initiate a review of anti-dumping measures in respect of the goods the subject of this application to:

1. ☒ **revise the level of the measures** because one or more of the variable factors relevant to the taking of measures have changed (a variable factors review)

In this case the factors that I consider have changed are:

- ☒ normal value
- ☒ export price
- ☒ non injurious price
- ☒ subsidy

The variable factors review is in relation to:

- ☐ a particular exporter (*if so provide name and country details*)
- ☒ exporters generally

or

2. ☐ **revoke the measures** because the anti-dumping measures are no longer warranted (a revocation review)

In this case the measure I consider should be revoked is:

- ☐ the dumping duty notice
- ☐ the countervailing duty notice
- ☐ the undertaking

The revocation review is in relation to:

- ☐ a particular exporter (*if so provide name and country details*)
- ☐ exporters generally

NOTE

Where seeking variable factors review as well as a revocation review, indicate this in *both* 1 and 2 above.

DECLARATION

I believe that the information contained in this application:

- provides reasonable grounds for review of the anti-dumping measure; and
- is complete and correct to the best of my knowledge and belief.

Signature:



Name:

Adrian Berton

Position:

General Manager AP Manufacturing

Company:

Paper Australia Pty Ltd.

ABN:

63 061 583 533

Date:

27/03/2020

Signature requirements

Where the application is made:

By a company - the application must be signed by a director, servant or agent acting with the authority of the body corporate.

By a joint venture - a director, employee, agent of each joint venturer must sign the application. Where a joint venturer is not a company, the principal of that joint venturer must sign the application form.

On behalf of a trust - a trustee of the trust must sign the application.

By a sole trader - the sole trader must sign the application.

In any other case - contact the Commission's client support section for advice.

Assistance with the application

The Anti-Dumping Commission has published guidelines to assist applicants with the completion of this application. Please refer to the '*Instructions and guidelines for applicants: Application for review or revocation of measures*' on the Commission's website.

The Commission's client support section can provide information about dumping and countervailing procedures and the information required by the application form. Contact the team on:

Phone: 13 28 46 or +61 2 6213 6000 (outside Australia)

Fax: (03) 8539 2499 or +61 3 8539 2499 (outside Australia)

Email: clientsupport@adcommission.gov.au

Other information is available from the Commission's website at www.adcommission.gov.au.

Small and medium enterprises (i.e., those with less than 200 full-time staff, which are independently operated and which are not a related body corporate for the purposes of the *Corporations Act 2001*), may obtain assistance, at no charge, from the International Trade Remedies Advisory (ITRA) Service. For more information on the ITRA Service, visit www.business.gov.au or telephone the ITRA Service Hotline on +61 2 6213 7267.

Review Period

The review period is *generally* the 12 month period preceding the initiation date and ending on the most recently completed month or quarter.

For the purposes of information requested in this application, please consider the review period as the 12 month period ending on the most recently completed quarter prior to the date that you submit the application.

The actual review period will be set by the Commissioner if a review is initiated, and may differ to that used by the applicant in the application form.

Required information

1. Provide details of the name, street and postal address, of the applicant seeking the review.
2. Provide details of the name of a contact person, including their position, telephone number and facsimile number, and e-mail address.
3. Name other parties supporting this application.
4. Describe your interest as an affected party (e.g. are you concerned with the exportation of the goods, the importation of the goods, or part of the

Australian industry, or acting on behalf of the Government of an exporting country).

5. Provide details of the current anti-dumping measure(s) the subject of this review application and the goods subject to the measure(s), including:

- tariff classification
- the countries and/or companies
- specified date of publication of the measure

6. If you are an exporter of the goods the subject of this application please answer the following questions:

- Have you exported the goods to Australia during the review period?
 - o If yes, what was the total quantity and total value of the goods exported to Australia during the review period?
- Have you previously (prior to the review period) exported the goods to Australia?
 - o If yes, please provide the total quantity and total value of the goods exported to Australia each year during the three years prior to the review period.
- Have you exported like goods to countries other than Australia during the review period?
 - o If yes, please provide the total quantity and total value of exports of the goods to each other country during the review period. Please indicate if any of the sales are to a related party.

NB: In relation to the goods the subject of this application, 'like goods' means goods that are identical in all respects to the goods the subject of this application or, although not alike in all respects to the goods the subject of this application, have characteristics closely resembling those goods (s 269T(1) refers).

NB: Please note you must provide this information if you are an exporter of the goods the subject of the application. If you are not an exporter of the goods, you may choose to provide information relevant to this question.

7. Provide the names, addresses, telephone numbers and facsimile numbers of other parties likely to have an interest in this matter e.g. Australian manufacturers, importers, exporters and/or users.

**Applications
for review of
variable
factors**

If you are applying for a variable factors review (in box 1 above) provide a detailed statement setting out your reasons. Include information about:

- the factor(s) you wish to have reviewed;
- the amount by which that factor is likely to have changed since anti-dumping measures were last imposed, and evidence in support; and
- in your opinion the causes of the change and whether these causes are likely to persist.

**Application
for a
revocation
review**

If you are applying for a revocation review (in box 2 above), provide a detailed statement setting out your reasons.

Include evidence in support of your view that there are reasonable grounds

	<p>for asserting that the measures are no longer warranted. Refer to the <i>'Instructions and guidelines for applicants: Application for review or revocation of measures'</i> as part of preparing your response. If you consider anti-dumping measures are no longer warranted because of:</p> <ul style="list-style-type: none"> • <i>no dumping or no subsidisation</i>: provide evidence that there is no dumping, or no subsidy, and why dumping or subsidisation is unlikely to recur if measures were revoked. • <i>no injury</i>: provide evidence that there is no current injury, and there is unlikely to be a recurrence of injury if the measures were to be revoked.
Lodgement of the application	<p>In accordance with subsection 269SMS(2) of the Act, this application, together with the supporting evidence, must be lodged by either:</p> <ul style="list-style-type: none"> • preferably, email, using the email address clientsupport@adcommission.gov.au, or • post to: The Commissioner of the Anti-Dumping Commission GPO Box 2013 Canberra ACT 2601, or • facsimile, using the number (03) 8539 2499 (or +61 3 8539 2499 if outside Australia)
Public Record	<p>During a review all interested parties are given the opportunity to defend their interests, by making a submission. The Commission maintains a public record of these submissions. The public record is available on the Commission's website at www.adcommission.gov.au.</p> <p>At the time of making the application both a confidential version (for official use only) and non-confidential version (public record) of the application <u>must</u> be submitted. Please ensure each page of the application is clearly marked "FOR OFFICIAL USE ONLY" or "PUBLIC RECORD". The non-confidential application should enable a reasonable understanding of the substance of the information submitted in confidence, clearly showing the reasons for seeking the review, or, if those reasons cannot be summarised, a statement of reasons why summarisation is not possible. If you cannot provide a non-confidential version, contact the Commission's client support section for advice.</p>

Required information – Part A**A-1 Provide details of the name, street and postal address, of the applicant seeking the review.**

The applicant company requesting a review of measures applicable to A4 copy paper exported from Brazil, The People's Republic of China ("China"), the Republic of Indonesia ("Indonesia"), excluding exports by PT Indah Kiat Pulp & Paper Tbk ("Indah Kiat") and PT Pindo Deli Pulp & Paper Mills ("Pindo Deli") and the Kingdom of Thailand ("Thailand") is Paper Australia Pty Ltd. Paper Australia Pty Ltd trades as "Australian Paper" and is referred to as "AP" in this application. AP is a manufacturer and seller of A4 copy paper, the goods the subject of this application.

Anti-Dumping Commission Report No. 341 published on 18 April 2017 details the findings of the Anti-Dumping Commission ("the Commission") concerning the imposition of dumping measures applicable to exports from Brazil, China, Indonesia and Thailand and countervailing measures applicable to exports from China.

Details of the applicant company requesting the review of the measures is as follows:

Paper Australia Pty Ltd (ACN 061 583 533)
307 Ferntree Gully Road,
Mt. Waverley VIC 3149

Australian Paper Pty. Ltd. (ACN 082 475 438) is a wholly owned subsidiary company of Paper Australia Pty Ltd and is effectively dormant.

Exports of the goods (other than to New Zealand) are generally undertaken by 'Paper Products Marketing' (abbreviated 'PPM'), a collection of 5 subsidiary companies of Paper Australia Pty Ltd which trades in paper worldwide.

Throughout this application, 'Australian Paper' or 'AP' will refer to Paper Australia Pty Ltd, which includes Australian Paper and the 5 subsidiary companies that make up PPM.

A-2 Provide details of the name of a contact person, including their position, telephone number and facsimile number, and e-mail address.

Relevant contact details within AP are as follows:

Contact Name: Matt Decarne
Company and position: Trade Affairs Manager
Address: 307 Ferntree Gully Road, Mt Waverley, Victoria, 3149
Telephone: (03) 8540 2451
Facsimile: (03) 8540 2284
E-mail address: matt.decarne@australianpaper.com.au
ABN: 49 082 475 438

Alternative contact

Name: Adrian Berton
Position in company: General Manager AP Manufacturing
Address: 307 Ferntree Gully Road, Mt Waverley, Victoria, 3149
Telephone: (03) 5136 0200
Facsimile: (03) 5134 6127

E-mail address: Adrian.Berton@australianpaper.com.au

Authorised representative

Name: John O'Connor
Business name: John O'Connor and Associates Pty Ltd
Address: P.O. Box 329, Coorparoo Qld, 4151
Telephone: (07) 3342 1921
Facsimile: (07) 3342 1931
E-mail address: jmoconnor@optusnet.com.au
ABN: 3909 865 0241

A-3 Name other parties supporting this application.

AP is the sole Australian manufacturer of A4 copy paper the subject of the measures.

A-4 Describe your interest as an affected party (e.g. are you concerned with the exportation of the goods, the importation of the goods, or part of the Australian industry, or acting on behalf of the Government of an exporting country).

AP is the sole Australian manufacturer of A4 copy paper, producing the goods at its Maryvale facility located at Morwell, Victoria. In Investigation No. 341 ("Inv 341") the Commission confirmed that the goods manufactured by AP are physically, commercially, and functionally alike as well as being produced in a similar manner to the imported goods. AP therefore submits that the imported goods possess the same essential characteristics and are "alike" to the locally produced A4 copy paper.

The Commission determined in Inv 341 that certain exports from named countries had been exported at dumped prices, and those exports had caused material injury the Australian industry which is made up entirely of goods produced by AP.

A-5 Provide details of the current anti-dumping measure(s) the subject of this review application and the goods subject to the measure(s), including:

- tariff classification
- the countries and/or companies
- specified date of publication of the measure

The imported products the subject of this review of measures application to which the dumping and countervailing duty notices apply are:

uncoated white paper of a type used for writing, printing or other graphic purposes, in the nominal basis weight range of 70 to 100 gsm and cut to sheets of metric size A4 (210mm x 297mm) (also commonly referred to as cut sheet paper, copy paper, office paper or laser paper).

The paper is not coated, watermarked or embossed and is subjectively white. It is made mainly from bleached chemical pulp and/or from pulp obtained by a mechanical or chemi-mechanical process and/or from recycled pulp.

The tariff classifications and statistical codes of the imported goods since 1 January 2012 are:

Period	Subheading/statistical code	Description/gsm
From 1 January 2012	4802.56.10/03	A4 paper 40-89 gsm white
	4802.56.10/09	A4 paper 90 to less than 150 gsm
Prior to 1 January 2012	4802.56.10/03	A4 paper 40-89 gsm

This application for review of measures is limited to imports of A4 copy paper. In Inv 341 it was brought to the attention of the Commission that some goods could be imported under subheading 4802.56.00 statistical code 09. This includes some A4 copy paper that is greater than 89 gsm and up to and including 100 gsm.

Measures apply to goods from the People's Republic of China (China), the Kingdom of Thailand (Thailand), Republic of Indonesia (Indonesia), the Federative Republic of Brazil (Brazil), Finland, the Republic of Korea (Korea), the Russian Federation (Russia) and the Slovak Republic (Slovakia).

On 19 April 2017, with an effective date of 20 April 2017, anti-dumping measures in the form of interim dumping duty (IDD) were imposed on A4 Copy Paper exported from the People's Republic of China (China), the Republic of Indonesia (Indonesia), the Federative Republic of Brazil (Brazil) and the Kingdom of Thailand (Thailand), except for exports by PT Pabrik Kertas Tjiwi Kimia Tbk (Tjiwi Kimia).

On 19 April 2017, with an effective date of 20 April 2017, anti-dumping measures in the form of interim countervailing duty (ICD) were also imposed on A4 Copy Paper exported from China, except for exports by UPM (China) Co. Ltd (UPM) and Asia Symbol (Guangdong) Paper Co. Ltd (Asia Symbol).

Full details of the measures are included Report No. 341 and Anti-Dumping Notices ADN 2017/39 and ADN 2017/40.

For the purposes of this application for review of measures, that AP requests that the the Anti-Dumping Commission (the Commission) initiate a variable factors review on exports from China, Thailand, Indonesia (except for exports by PT Indah Kiat Pulp & Paper Tbk ("Indah Kiat") and PT Pindo Deli Pulp & Paper Mills ("Pindo Deli"), and Brazil to Australia.

A-6 If you are an exporter of the goods the subject of this application please answer the following questions:

- Have you exported the goods to Australia during the review period?
 - If yes, what was the total quantity and total value of the goods exported to Australia during the review period?
- Have you previously (prior to the review period) exported the goods to Australia?
 - If yes, please provide the total quantity and total value of the goods exported to Australia each year during the three years prior to the review period.
- Have you exported like goods to countries other than Australia during the review period?
 - If yes, please provide the total quantity and total value of exports of the goods to each other country during the review period. Please indicate if

any of the sales are to a related party.

NB: In relation to the goods the subject of this application, 'like goods' means goods that are identical in all respects to the goods the subject of this application or, although not alike in all respects to the goods the subject of this application, have characteristics closely resembling those goods (s 269T(1) refers).

NB: Please note you must provide this information if you are an exporter of the goods the subject of the application. If you are not an exporter of the goods, you may choose to provide information relevant to this question.

AP is an Australian manufacturer of the goods the subject of this application and is considered to be the Australian industry under the anti-dumping provisions. This question therefore does not apply to AP as an applicant for the review of the measures.

A-7 Provide the names, addresses, telephone numbers and facsimile numbers of other parties likely to have an interest in this matter e.g. Australian manufacturers, importers, exporters and/or users.

Exporters

Brazil

International Paper Do Brasil Ltda, supplied directly or through;
International Paper Exportadora Ltda
International Paper Brazil
Avenida Paulista, 37 14º andar
01311-902 São Paulo SP, Brazil
Tel : +55-11-3797-5797

Thailand

Phoenix Pulp & Paper Co. Ltd, supplied directly or through;
Central National Australia Pty Ltd; or
Central National Australia; or
Fuji Xerox Printers
C/o The Siam Cement PLC
1 Siam Cement Road
Bangsue Bangkok 10800 Thailand
Tel: +662 586 4444

Double A (1991) Public Company Ltd
187/3 Moo 1, Bangna-Trad km. 42 Road
Bangwua District, Amphur Bangpakong
Chacoengsao, 24180 Thailand
Tel: +662 659 1234
Fax: + 66 38 538968-72 ext 2718

Indonesia

PT Riau Andalan Kertas (RAK), supplied directly or through;
April Fine Paper Trading Pte Ltd; or
April International Enterprise Pte Ltd
April Far East (Malaysia) SDN BHD
PT Riau Andalan Pulp and Paper Jl M.H.Thamrin (d/h Jl. Teluk Betung)

No. 31, Kebon Melati – Tanah Abang, Jakarta Pusat 10230, Indonesia
Tel: +62 (21) 3193 0134
Fax: +62 (21) 314 4604

China

UPM (China) Co. Ltd, supplied directly or through;
UPM Asia Pacific Pte Ltd; or
UPM-Kymmene Asia Pacific Pte Ltd; or
UPM-Kymmene (Suzhou) Paper Industry Co. Ltd
Shanghai Office
23/F, Grand Gateway Tower 2, No. 3 Hongqiao Road,
200030 Shanghai, China
Tel. +86 21 6288 1919
Fax +86 21 6288 2929/1079

Asia Symbol (Guangdong) Paper Co. Ltd, supplied through;
Greenpoint Global Trading (Macao Commercial Offshore) Ltd
No 369 Beijing Road
Rizhao, Shandong Province
China
Tel : +86 633 336 1000
Fax : +86 633 336 1280

As well as all other exporters from the abovementioned countries.

Importers

[Importers]

AP understands that there are also a number of other smaller importers servicing the Australian market.

Applications for review of variable factors – Part B

If you are applying for a variable factors review (in box 1 above) provide a detailed statement setting out your reasons. Include information about:

- 1. the factor(s) you wish to have reviewed;*
- 2. the amount by which that factor is likely to have changed since anti dumping measures were last imposed, and evidence in support; and*
- 3. in your opinion the causes of the change and whether these causes are likely to persist.*

1. The factor(s) you wish to have reviewed

AP is seeking a review of each of the variable factors applicable to the subject goods (i.e. normal values, export prices and non-injurious price).

2. The amount by which that factor is likely to have changed since anti-dumping measures were last imposed, and evidence in support.

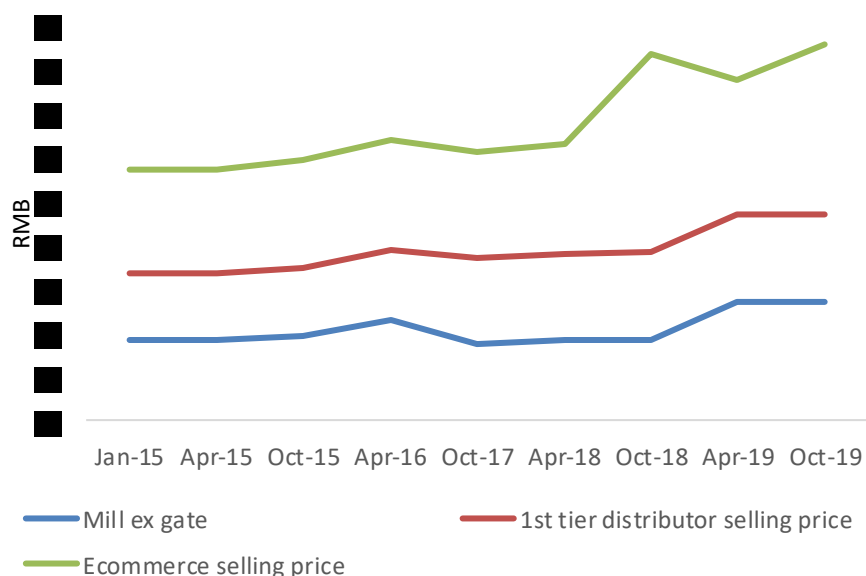
a. Change in Normal Values

AP is aware that raw material pulp prices and A4 copy paper prices have increased materially since the 2015 investigation period.

i. China domestic prices

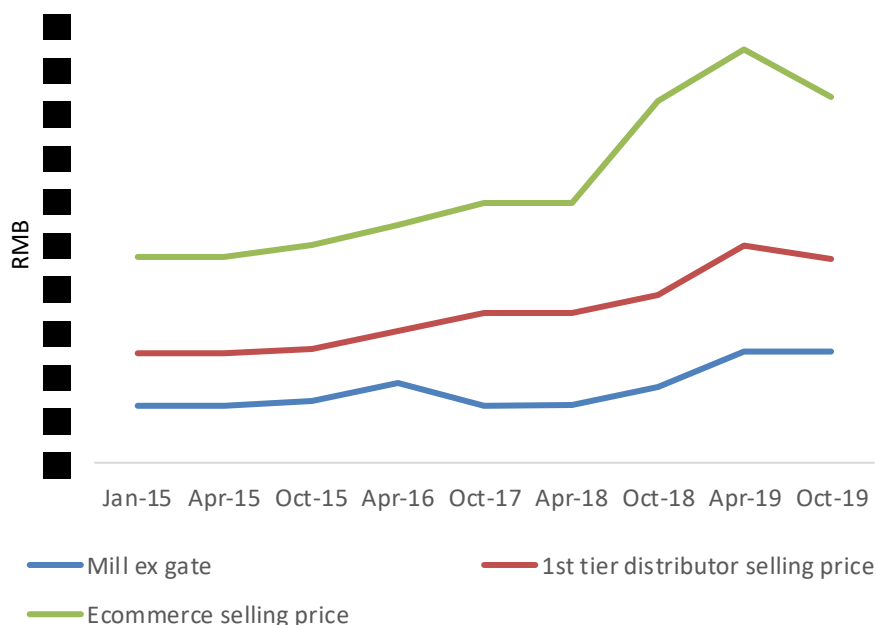
The following graph depicts changes in the APP and April domestic selling prices since 2015, including the VAT rate change that reduced from 17 per cent to 13 per cent with effect from 1 April 2019.

Chart 1 - APP “Flagship” domestic prices ex factory, first tier distributor and e-commerce



Source: Market survey at Confidential Attachment 2.

Chart 2 – April “PaperOne” domestic prices ex factory, first tier distributor and e-commerce



Source: Market survey at Confidential Attachment 2.

Charts 1 and 2 demonstrate an increase in domestic selling prices for A4 copy paper sold domestically in China since 2015. AP estimates that the change in domestic prices is between RMB [REDACTED] for ex factory prices; RMB [REDACTED] for first tier distributor prices; RMB [REDACTED] for e-commerce prices. Chinese domestic prices for A4 copy paper have, therefore, have increased since the original 2015 investigation period.

ii. Brazil domestic prices

AP has examined domestic selling prices for uncoated woodfree cutsize 75-95 grm paper sold in Brazil from 2015 to 2019. The following Table confirms average selling prices from 2015 to 2019.

Table 1 – Average domestic selling prices for 75-95 gsm uncoated woodfree paper (i.e. copy paper) in Brazil

	2015	2016	2017	2018	2019
75-95gsm (AUD\$ per tonne)	\$[REDACTED]	\$[REDACTED]	\$[REDACTED]	\$[REDACTED]	\$[REDACTED]

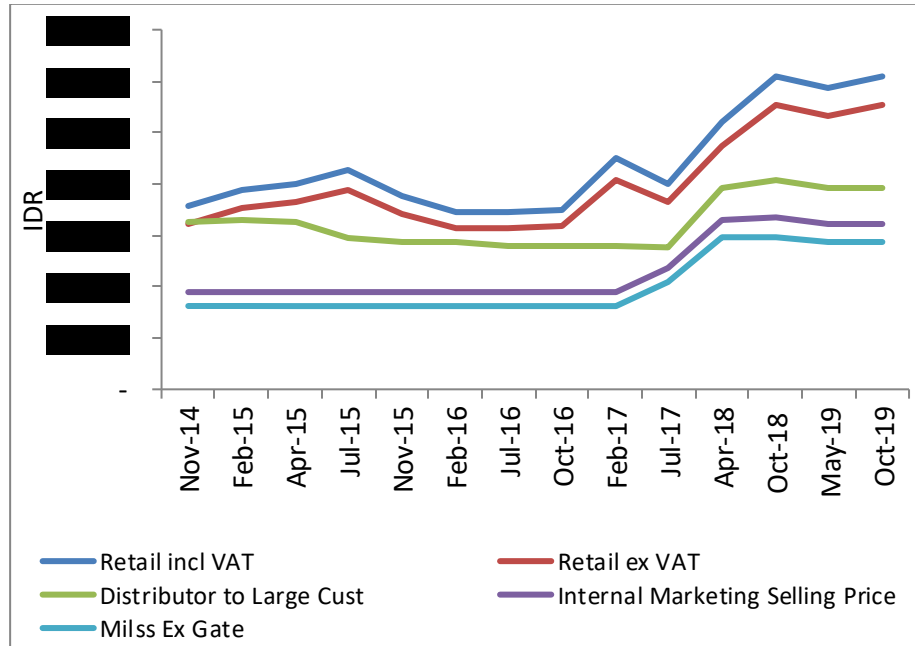
Source: PPI Markets and Prices at Confidential Attachment 3.

Domestic prices for uncoated woodfree cutsize paper, 75-95 gsm have increased between 2015 and 2017, stabilized and have fallen slightly in 2019 although remain approximately [REDACTED] per cent above 2015 levels.

iii. Indonesian domestic prices

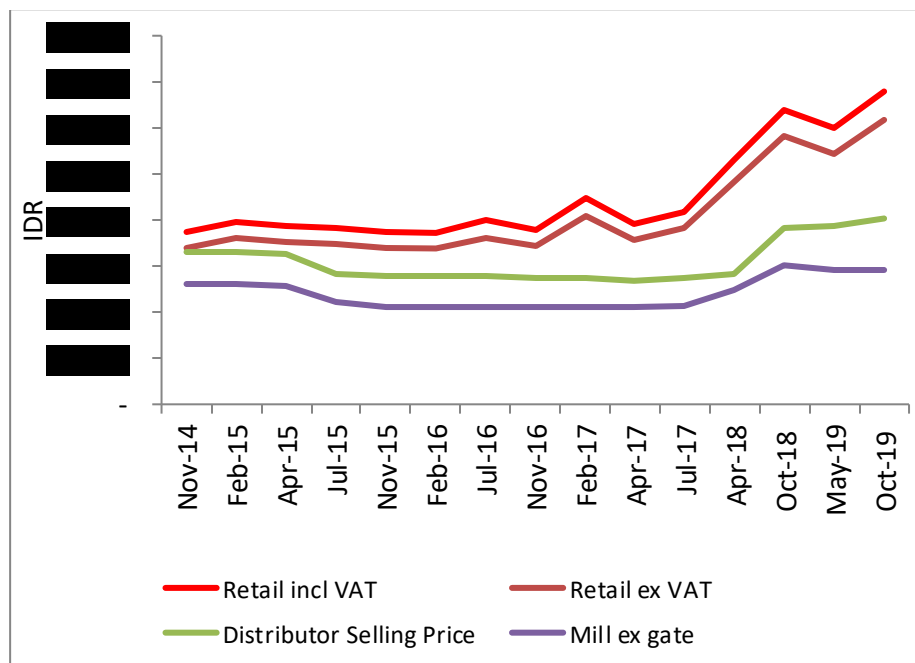
Indonesian domestic prices for A4 copy paper have also increased since the 2015 investigation period. The following prices for APP and April sales made domestically in Indonesia confirm higher prices for A4 copy paper in 2019.

Chart 3 – APP “Bola Dunia” domestic prices end 2014 to Oct 2019



Source: Market survey at Confidential Attachment 4.

Chart 4 – April “Paper One” domestic prices in end 2014 to Oct 2019



Source: Market survey at Confidential Attachment 4.

Domestic selling prices for A4 copy paper in Indonesia have increased since the 2015 Investigation period for Investigation 341. Price increases for ex-factory sales are from IDR ██████ to ██████ i.e. around ██████ per cent. Price increases via other channels are even larger than ex-factory price increases in Indonesia.

iv. Thailand domestic prices

AP has followed domestic prices for A4 copy paper in Thailand since 2015. Domestic prices for A4 copy paper sold by Thai Paper and Double A have remained flat since 2015 due to increased competition.

Please refer to Confidential Attachment 5 for market survey information on domestic A4 copy prices in Thailand.

b. Changes in Export prices

Export prices for A4 copy paper sold to Australia have increased following the imposition of measures in April 2017. Table 2 below demonstrates that the anti-dumping measures have contributed to increases in FOB export prices to Australia – particularly in 2018 and 2019.

Table 2 – FOB export prices for A4 copy paper to Australia

	2015	2016	2017	2018	2019
Brazil	\$1042	\$988	\$982	\$1249	\$1117
China	\$883	\$830	\$819	\$979	\$1256
Indonesia	\$805	\$773	\$831	\$1096	\$1205
Thailand	\$1084	\$1115	\$1132	\$1370	\$1479

Source: [source] Import and export data.

The published export data confirms material changes in FOB export prices for A4 copy paper exported to Australia from Brazil, China, Indonesia and Thailand.

c. Change in Non-injurious price

AP contends that the unsuppressed selling price (“USP”) from which the non-injurious price (“NIP”) was determined in Report 341 is no longer contemporary as AP’s weighted average selling price and cost-to-make-and-sell (“CTMS”) have changed since the 2015 investigation period.

Chart 5 – AP Domestic Sell Price and CTMS

[Chart – AP Domestic selling price and CTMS]

Source: Confidential Attachment 6 with data from AP financial appendices

AP has experienced a reduction in its margin over costs since the period July 2012 to June 2013 on which the USP was based. During “the period unaffected by dumping” AP’s weighted-average selling prices was \$XXXX per tonne. In 2015, AP’s weighted-average domestic selling price was \$XXXX. AP’s selling price declined in 2016 and further again in 2017, and remained flat in 2018. AP experienced a small price recovery in 2019, however, the selling price achieved was only XX per cent higher than AP’s selling price in 2015, and it is still XX per cent lower than the 2012 – 2013 period.

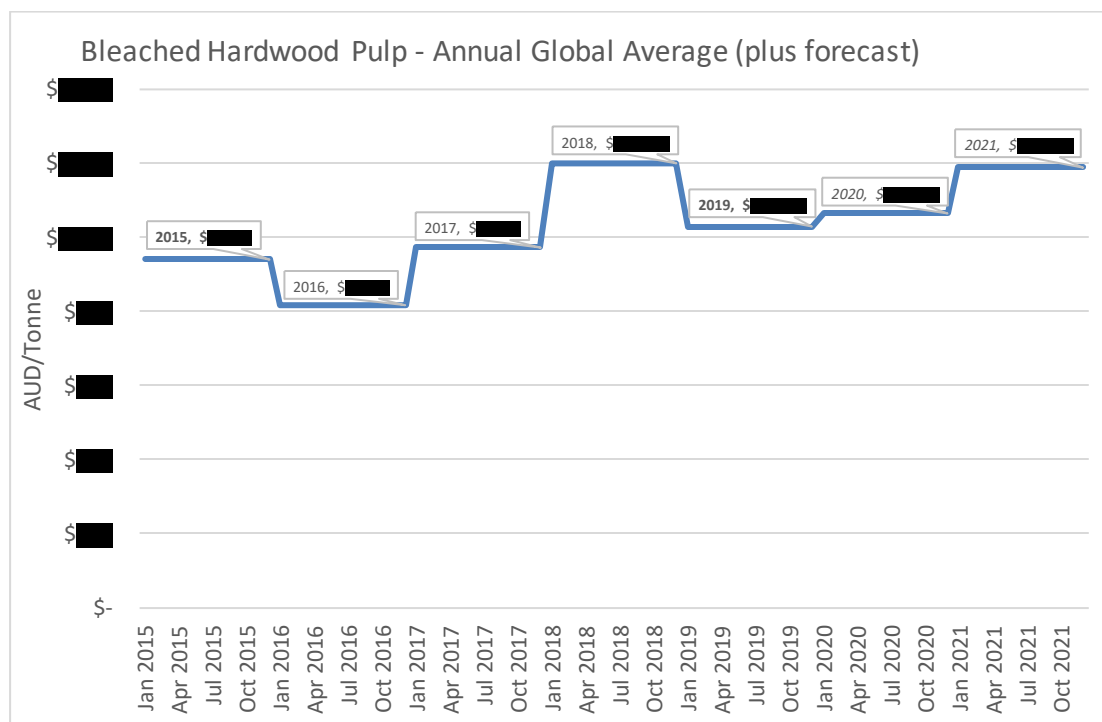
This decrease in domestic sell price is made more concerning as it has not been adjusted for inflation, and that doing so would exacerbate the nominal decrease in prices in 'real terms'.

Meanwhile, since 2015, AP's CTMS has increased by XX per cent, even though AP has increased production and sales over the following four-year period. AP has experienced pricing pressures from imports – initially from countries the subject of Investigation No. 463 – and subsequently from the re-emergence of exports from the countries in Investigation 341 – Brazil, China, Indonesia and Thailand – due to the low variable factors that do not reflect current selling prices and costs to make A4 copy paper.

AP considers that the selling price determined in the period unaffected by dumping is a relevant benchmark – as is the level of profit included in the USP. AP has been unable to achieve the desired USP due to new sources of dumping (Investigation 463) and the issue of the CTMS increasing through higher pulp and energy prices (for all A4 copy paper producers) since 2015 not being passed on in final selling prices.

The following graph depicts changes in global pulp prices from 2015 to 2019, confirming AP's experiences.

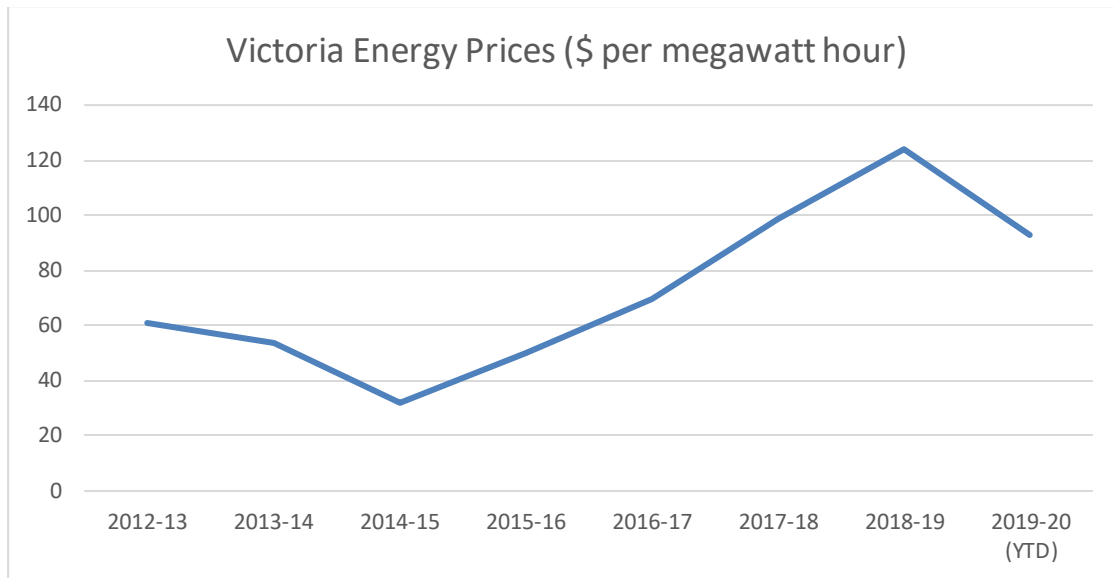
Chart 6 – Global pulp price movements 2015 to 2019



Source: [Source] Confidential Attachment 7

From the above graph it can be seen that global annual average pulp prices have increased by \$[redacted] per tonne since 2015 or [redacted] per cent. [Source] forecasts also predict a further [redacted] per cent increase in pulp prices in the next 2 years.

Chart 7 – Victorian Energy Prices



Source: Australian Energy Regulator – Confidential Attachment 8

Summary – the amount by which that factor is likely to have changed since anti-dumping measures were last imposed, and evidence in support;

It is AP's view that increases in pulp prices and energy costs and AP's overall CTMS of XX per cent following Investigation 341 should have translated to higher selling prices for A4 copy paper manufactured and sold in Australia. Producers/exporters in Brazil, China, Indonesia and Thailand also experienced similar, overall cost increases, however, these have not translated into increased selling price sin Australia – even though export prices from the four countries have increased in 2018 and 2019.

Export prices to Australia from Brazil, China, Indoensia and Thailand increased by between 20 and 32 per cent in 2018 (over 2017) as measures impacted export prices. These higher export prices from the nominated countries did not translate into higher selling prices for AP as dumping from new countries (i.e Investigation 463 countries) undercut the selling prices of exporters in Brazil, China, Indoensia and Thailand.

AP has experienced aggressive price competition in the domestic market due to the sustained and continuing effect of dumped goods being exported to the Australian market. Whilst there has been a recent small increase in the weighted average domestic selling price in 2019 as a result of the impact of measures from Inv 463, AP's prices have remained under pressure from the out-dated measures that apply to exports from Brazil, China, Indonesia and Thailand.

The cause of continued price depression/suppression is that the Inv 341 countries have recommenced exports to Australia at prices which are below AP's comparative USP for 2019 (i.e. 2019 costs plus a reasonable amount of profit).

Given that market prices have moved up since 2017, the pricing floor and dumping margins calculated in the Inv 341 case are now no longer effective in removing injury to the Australian industry.

3. In your opinion the causes of the change and whether these causes are likely to persist.

It is AP's view that increased prices for raw material pulp and energy costs are indicative of sustained price movements in the pulp and paper industry and that these price increases are likely to continue. AP further considers that the low costs and selling prices evidenced in 2015 were industry lows that were unsustainable.

Request for Review of Measures

AP requests that the Commissioner initiate an investigation into the review of the variable factors applicable for exports of A4 copy paper from Brazil, China, Indonesia (except for exports by PT Indah Kiat Pulp & Paper Tbk and PT Pindo Deli Pulp & Paper Mills) and Thailand to ensure the revised measures reflect contemporary costs and prices for exporters in the nominated countries.