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The Director - Investigations 2
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

Review of measures into A4 Copy Paper exported from Brazil

Dear Director,

This submission is made on behalf of Jackaroo Paper Pty Ltd (“Jackaroo”) to the current review of measures into A4 copy paper exported from Brazil (Review 551). Jackaroo wishes to briefly respond to points made by Paper Australia Pty Ltd (AP) in its most recent submission of 28 September 2020.

First, to avoid any confusion or misunderstanding stemming from Jackaroo’s previous statements about the import volumes from South Africa, relative to import volumes from Brazil, Jackaroo confirms the following. Based on its understanding of the South African import volumes during the review period, those imports were approximately [REDACTED] times greater than corresponding imports from Brazil.

Further, imports from South Africa in 2019 exceeded the total annual import volume from Brazil in all but one year spanning the period from 2009 to 2019. Over the 11 year period from 2009 to 2019, the average annual import volume from Brazil was approximately [REDACTED] tonnes. This compares to the estimated South Africa import volume during the review period of [REDACTED] tonnes, confirming that South African import volumes were more than [REDACTED] the annual average import volume from Brazil over the past 11 years.

Second, Jackaroo has provided the Commission with evidence of price offers for imported copy paper imported from South Africa. The submitted evidence confirms that AP’s import price offers were substantially lower than prevailing market prices for domestically produced like goods and price offers from alternative export sources. The evidence also confirms that AP offered those prices into the market and that those prices set the prevailing market price for comparable imported products.

Finally, the lesser duty rule is intended to allow imports subject to measures to be exported at price levels that would not cause injury to the Australian industry producing like goods.

PUBLIC VERSION

Given that AP was willing to offer imports from South Africa at the evidenced prices, and it does not consider those prices to be injurious, it is reasonable to conclude that imports from Brazil at those same price levels would equally be non-injurious. For this reason, Jackaroo contends that the non-injurious should be calculated by reference to AP's South African imported selling prices less necessary import and post-exportation deductions to calculate the free-on-board non-injurious price.

Yours sincerely

John Bracic