



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

31 May 2021



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

Review of measures applying to 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. It responds to the submission of 24 May 2021 by Australian Paper which itself responded to Jackaroo’s views addressing the preliminary findings set out in SEF 551.

Australian Paper continues to understate the importance of its South African imports and the impact that its selling prices of those imports had on suppressing broader market prices. Jackaroo has presented its views to the Commission, supported by clear evidence, of the need for the unsuppressed selling prices to properly take account of Australian Paper’s own injurious import and selling prices.

Australian Paper also questions the ‘legal basis’ for ensuring proper comparison of the determined normal values and non-injurious prices. The concept of ‘proper comparison’ is fundamental to the determination of dumping, and equally important to the imposition of measures. The Commission’s Dumping and Subsidy Manual reflects this in its stated practice in calculating the non-injurious price:

When implementing anti-dumping measures, a single NIP is worked out for each exporter of the goods under consideration. Where there are a number of models or types of the good, that single NIP may be worked out as a weighted average. For example, a weighted average of the individual NIPs of each model/type, or of each main model/type.

This confirms and supports the view that observed differences between models, which are expected to generate differences in unsuppressed selling prices and non-injurious prices, will be taken into account in calculating a single weighted average non-injurious price for each exporter.

PUBLIC VERSION

As Jackaroo has noted in its response to SEF 551, a proper price comparison is necessary and critical to ensuring that the imposed measures are effective, and not go beyond addressing the effects of dumping. Therefore, Jackaroo reiterates that the following costs incurred by Australian Paper must be excluded from the constructed USPs for imports from Brazil:

- a) all direct selling expenses related to sales of the industry's 'Reflex' brand, including advertising expenses, commissions, etc;
- b) all manufacturing costs associated with recycled copy paper;
- c) selling prices for recycled and/or Reflex branded products in calculating industry's profit from 2012-13; and
- d) all direct selling expenses associated with the industry's exportation of jumbo rolls and subsequent reimportation of cut-size paper.

Yours sincerely

John Bracic