

7 March 2022

Mr Cameron Kennedy  
A/g Assistant Director  
Investigations 3  
Anti-Dumping Commission  
GPO Box 2013  
Canberra ACT 2601

Email: [Investigations3@adcommission.gov.au](mailto:Investigations3@adcommission.gov.au)

**Public File**

Dear Mr Cameron

**Investigation No. 582 – Further submission by Guardian RAK of 3 March 2022**

We refer to the further submission by the UAE exporter Guardian Zoujaj International Float Glass Co. LLC (“Guardian RAK”) of 3 March 2022 (EPR Document No. 030).

Guardian Zak questions Oceania Glass’ response to questions from the Anti-Dumping Commission (“the Commission”) submission dated 25 February 2022. Oceania Glass seeks to refute these recent assertions by Guardian ZAK.

1. Guardian ZAK persists with its reference to an “*Import Parity Model*” for which it asserts Oceania Glass sets its pricing. As indicated, Oceania Glass has access to ABS import data and is aware of pricing via the Xinyi Glass website for validating the competitor offers it encounters on the Australian market.
2. Oceania Glass questions the logic of Guardian ZAK that the Australian industry has not suffered injury from price undercutting when it is not in dispute that Guardian ZAK’s prices are below the Australian industry’s selling prices. As demonstrated in SEF 582 (Figure 11, P.58) Oceania Glass experienced price depression and price suppression between 2016/17 and 2020/21 and could not raise prices from injurious levels due to the dumping;
3. Guardian ZAK appears to be questioning the Commission’s assessment of the price undercutting evidenced at Customers B, C and D in SEF 582 as to whether this is significant. With selling prices from the UAE at the lowest in the market during the investigation period it is difficult to arrive at any other conclusion than the selling prices were injurious and causally linked to injury experienced by the Australian industry; and



Oceania Glass  
95 Greens Rd,  
Dandenong South,  
Victoria 3175,  
Australia

oceaniaglass.com.au

ABN 99 630 152 206

4. Oceania Glass responded to the representations by Guardian ZAK about price increases post the investigation period in its submission dated 25 February 2022.

These further representations by Guardian ZAK are intended to detract and divert attention away from the injury caused by the dumping of clear float glass ("CFG") exported from the UAE to Australia during the investigation period. It cannot be disputed that exports from the UAE by Guardian ZAK and Emirates Float Glass were at margins of dumping that were significant and undercut the selling prices of the Australian industry (and other importers) during the investigation period resulting in material injury to the Australian industry.

Oceania Glass therefore requests the Commissioner to recommend to the Minister the publication of dumping duty notices in respect of exports of CFG to Australia from the UAE to ensure future exports do not cause further injury to the Australian industry.

If you have any questions concerning this submission, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Anthony Alembakis', written over a horizontal line.

Anthony Alembakis  
Chief Financial Officer