



Australian Government
**Department of Industry,
Innovation and Science**

**Anti-Dumping
Commission**

Received

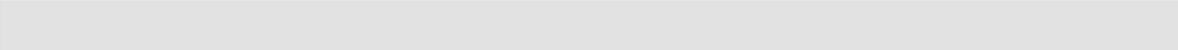
Anti-Dumping Commission 07/06/2021

Application for the
continuation of a dumping
and/or
countervailing notice

**APPLICATION UNDER SECTION 269ZHC OF THE *CUSTOMS ACT 1901*
FOR THE CONTINUATION OF A DUMPING AND/OR COUNTERVAILING
DUTY NOTICE OR CONTINUATION OF AN UNDERTAKING**

I hereby request, in accordance with section 269ZHC of the *Customs Act 1901* (the Act) that the Minister:

- continue a dumping duty notice, or
- continue a countervailing duty notice, or
- continue the undertaking given under the Act by

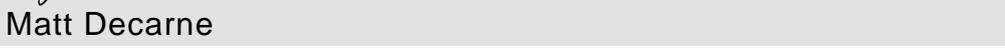

(Name of company or organisation)

in respect of the goods the subject of this application.

I believe that the information contained in this application:

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

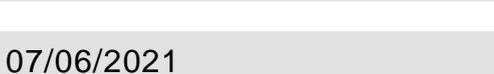
Signature: 

Name:  Matt Decarne

Position:  Trade Affairs Manager

Company:  Opal Australian Paper

ABN:  63 061 583 533

Date  07/06/2021

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 continuation*' 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

Fax: (03) 8539 2499

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 Department of Industry, Innovation and Science's 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.

Required information

1. Provide details of the name, street and postal address, of the applicant seeking the continuation.

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. The name 'Opal Australian Paper' or just 'Australian Paper' (abbreviated 'OAP' or 'AP') is used as a business or trading name for Paper Australia Pty Ltd and is the usual way in which Paper Australia Pty Ltd is referred to in common use.

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

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

Alternative contact

Name: Adrian Berton
Position in company: Group General Manager
Address: 307 Ferntree Gully Road, Mt Waverley,
Victoria, 3149
Telephone: (03) 5136 0200
E-mail address: adrian.berton@australianpaper.com.au

3. 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, users.

The following exporters are considered by OAP to have an interest in this matter:

Exporters

Brazil

International Paper Do Brasil Ltda, supplied directly or through;
International Paper Exportadora Ltda
International Paper Brazil
Avenida Paulista, 37 14° 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 & 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

Central National Australia Pty. Ltd.
420 Burwood Highway
Wantirna South, VIC, 3152
Tel: (03) 98816222

Complete Office Supplies
25 Nyrang Street
Lidcombe NSW 2141
Tel: 1300 882 244

Jackaroo
66 Balgowlah Road
Balgowlah NSW 2093
Tel : 02 9976 1300
Fax : 02 9976 3040

Paper Force (Oceania) Pty. Ltd.
Ste10/ 255 Whitehorse Rd.

Balwyn VIC 3103
Tel: (03) 8809 3333

Officeworks
236-262 E Boundary Rd,
Bentleigh East VIC 3165, Australia
Tel: 611300 633 423

Winc Australia
163 O'Riordan St,
Mascot NSW 2020
Tel: 1800 782 753

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

4. The application must include a detailed statement setting out reasons for seeking continuation of the anti-dumping measure. Applicants must provide evidence addressing whether, in the absence of measures, dumped or subsidised imports would cause material injury to the local industry producing like goods. Applicants should refer to the “Guidelines for Preparing an Application for Continuation of Measures” for assistance.

(i) Will the dumping or subsidisation continue, or recur?

a. anti-dumping actions by other countries;

In 2013 Mexico imposed anti-dumping and countervailing duties against Brazil in respect of uncoated woodfree (UWF) cut-size paper. In early 2019, further dumping measures were levied against Brazilian exports of UWF reels to Mexico which were being converted into cut-size paper after importation. In mid-2019 Mexico extended the life of the duties against Brazil, with the Mexican Secretariat stating that *“There are sufficient elements to determine that an elimination of the countervailing duties against paper imports from Brazil would allow dumping and would be prejudicial to national production,”* the Mexican Secretariat stated.

The current dumping/countervailing margin for Brazilian exports to Mexico for the like goods is 37.78%.

In 2016 The US imposed anti-dumping and countervailing duties against Australia, Brazil, Indonesia, China, and Portugal in respect of certain uncoated paper (uncoated woodfree paper of any cut-size). The weighted average dumping margins for countries relevant to this continuation application were;

- Brazil: 22.37 – 41.39%
- Indonesia: 2.1 – 66.81%
- China: 84.05%

The US subsequently extended the scope of the measures to include varying brightness papers as well as reels of UCWF paper to prevent circumvention.

In 2018 Pakistan imposed anti-dumping duties against exports from Brazil, China, Japan, Indonesia, and Thailand of uncoated printing/writing papers. The dumping

margins determined for countries relevant to this investigation were;

- Brazil: 42.8%
- China: 21.9%
- Thailand: 14.25%
- Indonesia: 10.62 – 20.66%

b. relevant evidence as to the current normal values in the exporting country;

The recently published Review 551 SEF analysed relevant exporter country normal values related to the 2019 investigation review period. Whilst OAP does not have access to the Commission's normal value calculations, it has been preliminarily determined by the Commission that the variable factors have altered since the original 2015 investigation period (including the normal values).

Opal Australia Paper applied for the variable factors review with the knowledge that raw material pulp prices and A4 copy paper prices had increased materially since the 2015 investigation period, and contended that based on the malalignment between cost to make and sell increases which should be reflected in normal values and low export prices to Australia, that dumping margins were likely to be materially greater than those calculated in the original investigation.

The "*China/Indonesia/Thailand Paper Price Annual Update*" reports contained in Confidential Attachments 1-3 were prepared by PT Clarity Research Indonesia ('Clarity') on behalf of Opal Australian Paper and details market pricing for major domestic copy paper brands in the domestic markets of China, Indonesia, and Thailand including those manufactured by APP, APRIL and Double A who are major domestic manufacturers in these countries.¹

China Domestic Prices

Opal Australian Paper Submits for the Commission's consideration *Confidential Attachment 1 China Clarity Tracking Jan 21*.

Chinese brands surveyed include APP China's 80gsm 'Flagship' brand, as well as APRIL China's 80gsm 'PaperOne' brand. The survey tracks prices since January 2015 and demonstrates market price increased across all major sales channels including the ecommerce channel which has become dominant since the proliferation of the COVID-19 pandemic. It is reported that Chinese domestic prices have risen by between 12 – 13 per cent since the original investigation.

[Confidential extract]

Indonesia Domestic Prices

Opal Australian Paper Submits for the Commission's consideration *Confidential*

¹ For information about Clarity market survey reports please visit <https://clarityindonesia.com/who-we-are/>

Attachment 2 Indonesia Clarity Tracking Jan 21.

Indonesian brands surveyed include APP Indonesia's 80gsm 'Bola Dunia', as well as APRIL Indonesia's 80gsm 'Paper One' brand. The survey tracks prices since February 2016 and demonstrates market price increased across all major sales channels including the ecommerce channel which has become dominant since the proliferation of the COVID-19 pandemic. It is estimated that Indonesian domestic prices have risen by between 20 – 40 per cent since the original investigation.

[Confidential extract]

Thailand Domestic Prices

Opal Australian Paper Submits for the Commission's consideration *Confidential Attachment 3 Thailand Clarity Tracking Jan 21.*

Thai brands surveyed include the 80gsm 'Double A' brand, as well as Thai Paper's 80gsm 'Ideal Work' brand. The survey tracks prices since January 2014 and demonstrates market price increased across all major sales channels. It is reported that Thai domestic prices have been relatively flat with Double A prices increasing by around 5 per cent since the original investigation.

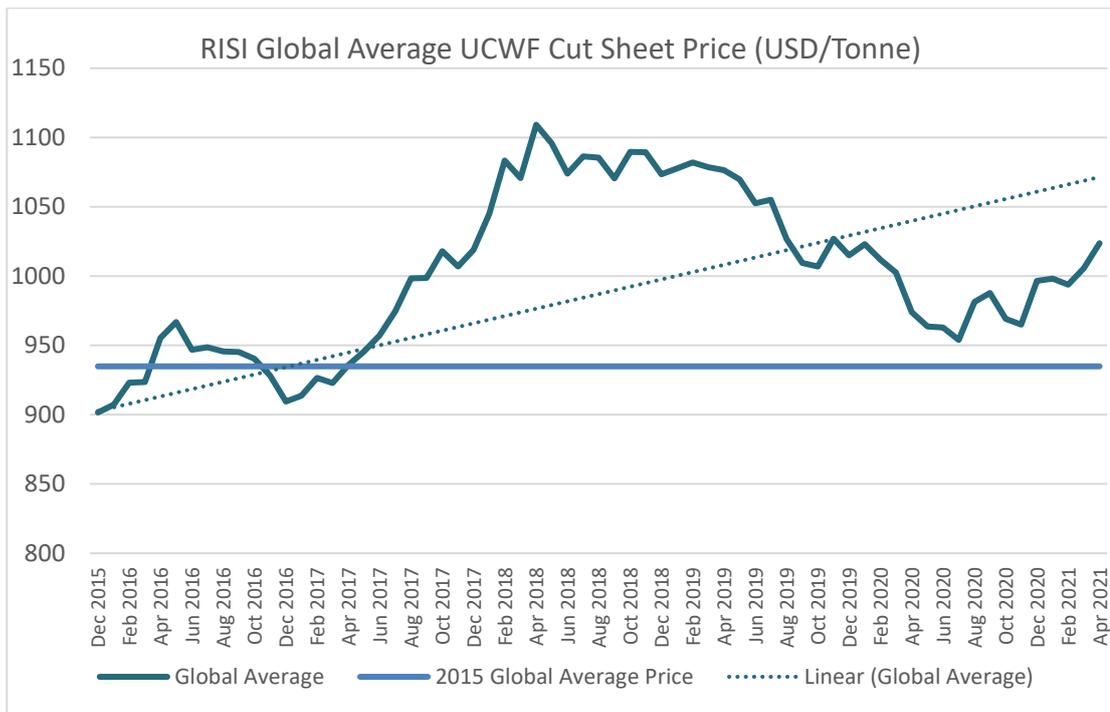
[Confidential extract]

Brazil Domestic Prices

Opal Australian Paper has not been able to obtain any data/information in relation to Brazilian domestic prices specifically, however, OAP submits *Confidential Attachment 4 RISI Global Cut Sheet UCWF Prices* for the Commission's consideration.

Whilst global copy paper markets have experienced some volatility over the past 5 years, global USD/Tonne prices have generally remained higher than 2015 global average prices. This is despite a continued global oversupply of the relevant grades due to enormous Chinese, Indonesian, Thai, and Brazilian capacities, which far exceed the volume of their domestic consumption. Ordinarily oversupply would dictate that there is downward pressure on prices, however, increasing input costs such as pulp, energy, and labour have necessitated higher trending market prices for the finished goods. Unfortunately higher prices have not proliferated in the Australian A4 copy paper market due to the continued impact of dumping.

Graph 1



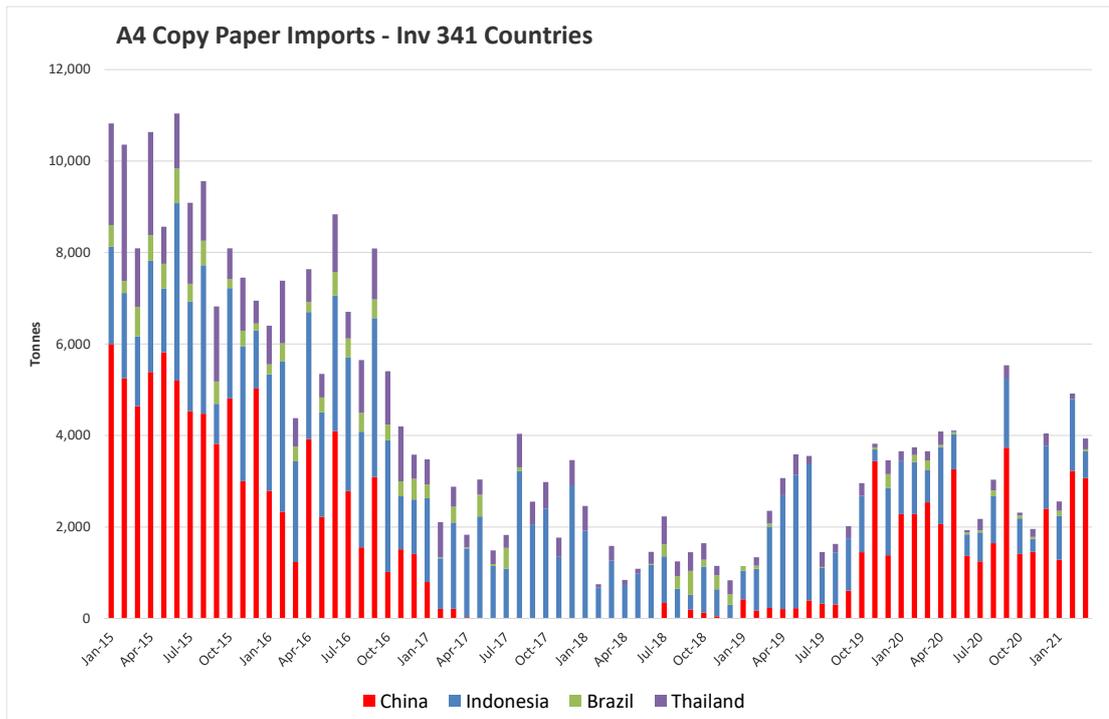
c. whether exports have continued following imposition of the measure and estimates of export price;

Opal Australian Paper has collated the graph below utilising TradeData International statistics, namely exports of A4 copy paper to Australia. Export statistics are obtained in lieu of Australian Bureau of Statistics ('ABS') import data as this data is made confidential due to ABS policy.²

Export Volumes

Graph 2

² In regards to the export data source TradeData states that; "The merchandise export data supplied to Opal Australia Paper is derived from official government statistical sources in each export country. Exporters (or their agents) must lodge export declaration information with the appropriate government agency prior to the departure goods. These declarations are submitted electronically and are a mandatory requirement. This information is then supplied to the government's statistical agency who collate, redact some details, and then release the information. TradeData obtains the information either directly from the government statistical agency or from a licenced reseller of the information."



Opal Australian Paper has collated exports to Australia related to the preceding 12 months for which data was available i.e. April 2020 to March 2021.

Table 1

Country	2015	12mths to Mar-21	% of 2015 Vol.
China	57,971	26,154	45%
Indonesia	26,362	11,656	44%
Brazil	5,339	561	11%
Thailand	17,803	2,220	12%

Exports from countries named in the original investigation accounted for 85 per cent of the Australia imports in the past 12-month period, totalling over 40,000 tonnes.

Whilst exports from Brazil and Thailand have decreased since the imposition of the dumping measures in April 2017, exports from both countries have consistently prevailed in the Australian market each year following Investigation No. 341.

Chinese exports to Australia declined following the imposition of dumping measures in April 2017, with major exporter UPM switching its supply to the Australian market from China to Finland. Subsequent Investigation No. 463 found the exports from UPM Finland were also dumped. Following the imposition of dumping measures on Finnish exports, UPM recommenced supply from its Chinese production. Chinese exports to Australia were able to resume on the back of increased global prices (as a result of increased costs to produce the goods), and indeed increased Australian domestic prices which insulated the Chinese exporter against the effect of the small dumping margin. This has resulted in the resumption of injury to the domestic industry, and OAP made an application for the review of variable factors (Review 551) relating to the 2019 year.

In the preceding 12-month period, Chinese exports to Australia were approximately 45% of the volume exported in the 2015 investigation period.

Opal Australian Paper notes that the Indonesian exports to Australia included in the above analysis also include exporters which were to be exempted from the dumping measures in the original investigation, namely Asia Pulp and Paper's ('APP') Tjiwi Kimia mill. The data may also include volume exported by APP's other Indonesian mills Pindo Deli and Indah Kiat for which dumping measures had been terminated as a result of Review Investigation No. 547. The remaining Indonesian exporter is Asia Pacific Resources International Limited ('APRIL') Group's Indonesian mill known as 'RAK', and is expected to be between 2,700 – 3,000 tonnes p.a.

It is known from market intelligence that RAK has continued to export the like goods to Australia albeit at reduced volumes. Additionally, Opal Australian Paper commissioned a report collated by TradeData International which breaks down Indonesian exports to Australia by exporter up to December 2020. This data set is included at *Confidential Attachment 5 Tradedata Indonesia exports*

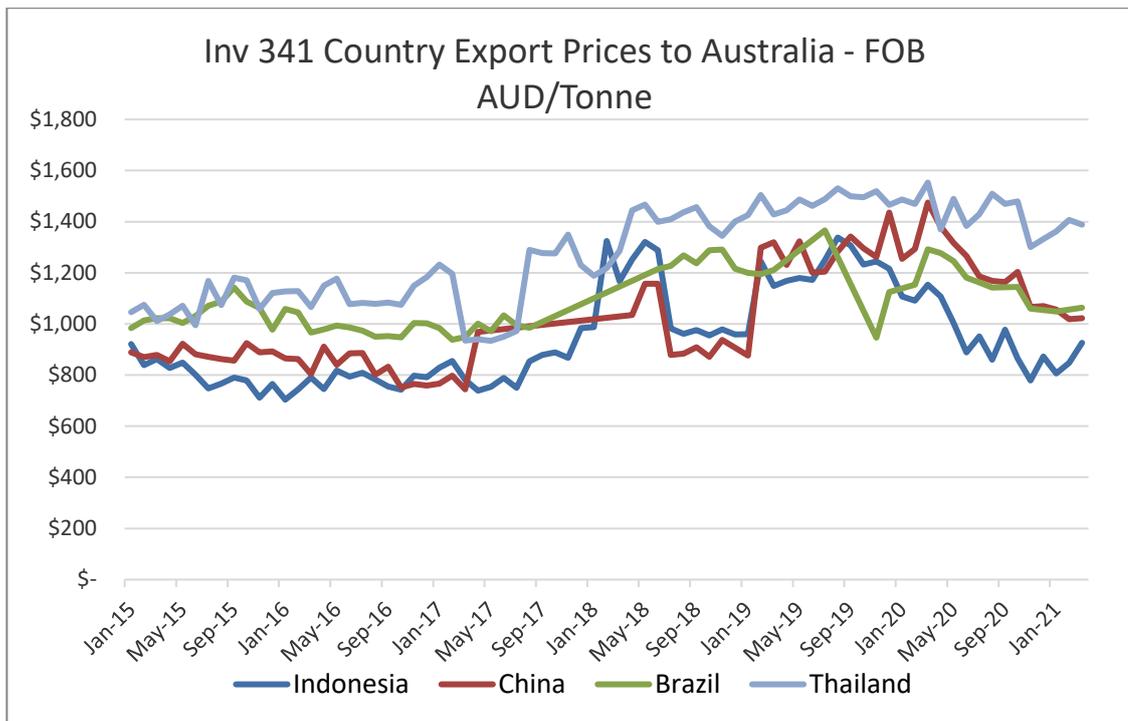
[Confidential Graph]

Export Prices

According to export statistic obtained from TradeData International, export prices from countries with measures imposed following Investigation 341 remained flat until May 2017. After this time prices slowly trended upwards before peaking in September 2019, and declining significantly throughout 2020 as exporters aggressively sought to maintain or increase market share in the increasingly competitive market place.

Given China and Indonesia's high representation in the imports and the significant price reductions in 2020, the weighted average price of the imports from subject countries is comparable to that experienced in 2015. This has been explored in detail in the current variable factors Review 551, and is supported by the Commission's preliminary findings outlined in the SEF.

Graph 4



Data supporting the above graph is contained in *Confidential Attachment 6 TradeData Export stats*.

d. whether the exporter has retained distribution links in Australia;

All exporting countries named in the Investigation 341 has continued to export volumes to Australia in varying degrees, and exporters of primary concern relating to the current measures including International Paper Do Brasil Ltda ('IP Brazil'), UPM China, APRIL Indonesia (RAK), and Double A Thailand, have all retained strong Australian distribution links. Importers Jackaroo (IP Brazil), Officeworks (UPM China), and independent resellers (Double A and RAK) have been sources of supply of dumped goods in the Australian market place in recent times.

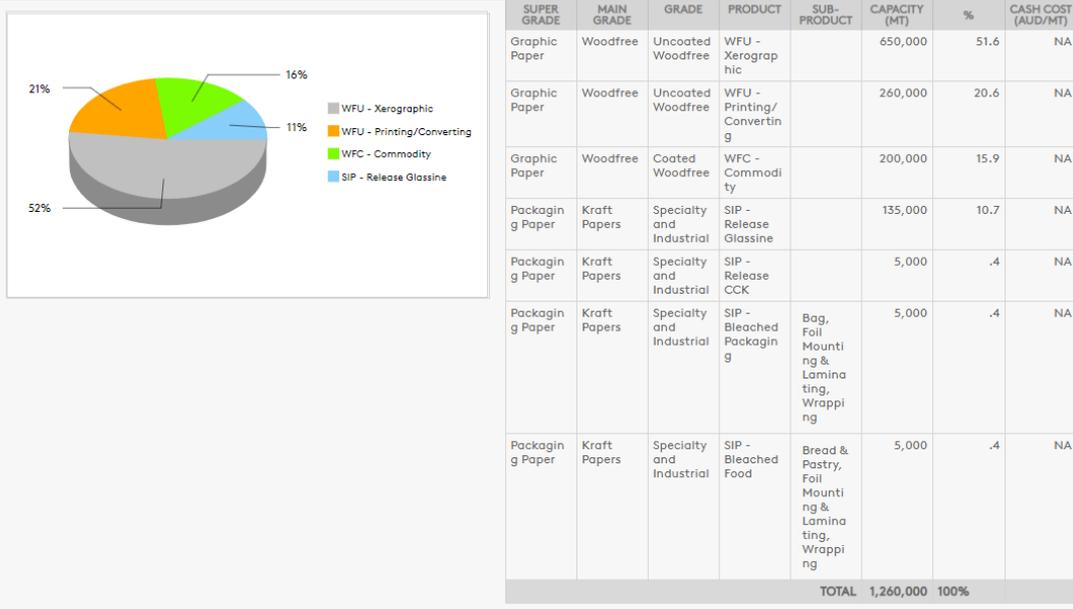
e. whether the exporter retains an excess capacity that may be directed to Australia.

UPM China Capacity

According to RISI,³ UPM China has an installed capacity at their Changshu mill of 650,000 tonnes p.a. for UCWF Xerographic paper more commonly known as 'cut sheet paper' or 'copy paper' and will include the like goods. This capacity alone is over 5 times the apparent consumption of the entire Australian market according to OAP's estimates.

³ RISI Fastmarket's 'Mill Asset database'

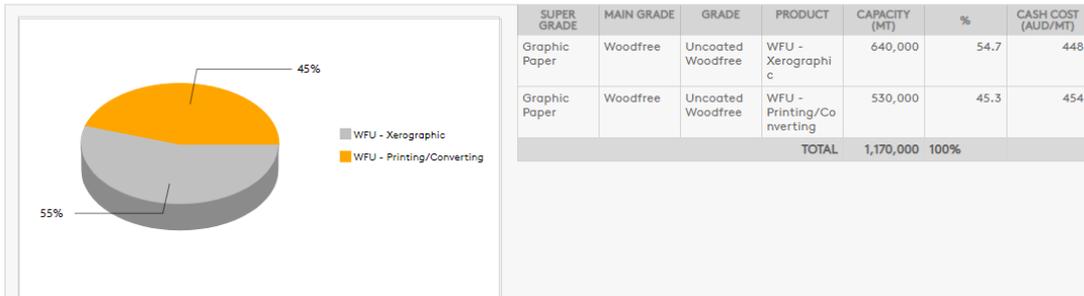
Finished Product Paper/Paperboard



RAK Indonesia Capacity

According to RISI, RAK Indonesia has an installed capacity at their Kerinci mill of 640,000 tonnes p.a. for UCWF Xerographic paper which includes the like goods. This capacity alone is just under 5 times the apparent consumption of the entire Australian market according to OAP's estimates.

Finished Product Paper/Paperboard



IP Brazil Capacity

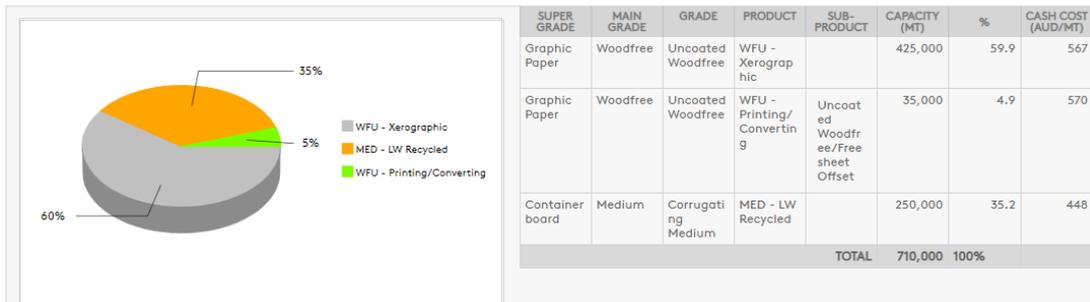
According to RISI, IP Brazil has an installed capacity across their three mills of 675,801 tonnes p.a. for UCWF Xerographic paper which includes the like goods. This capacity alone is over 5.2 times the apparent consumption of the entire Australian market according to OAP's estimates.

PARENT COMPANY	ASSET NAME	SUPER GRADE	MAIN GRADE	GRADE	PRODUCT	PRODUCT PRODUCED (MT/Y)
International Paper	Luiz Antônio Mill	Graphic Paper	Woodfree	Uncoated Woodfree	WFU - Xerographic	251,685
International Paper	Mogi Guaçu Mill	Graphic Paper	Woodfree	Uncoated Woodfree	WFU - Xerographic	189,210
International Paper	Três Lagoas Mill	Graphic Paper	Woodfree	Uncoated Woodfree	WFU - Xerographic	234,906
Total						675,801

Double A Thailand

According to RISI, Double A Thailand has an installed capacity at their Prachinburi mill of 425,000 tonnes p.a. for UCWF Xerographic paper which includes the like goods. This capacity alone is approximately 3.3 times the apparent consumption of the entire Australian market according to OAP's estimates.

Finished Product Paper/Paperboard



(ii) Will the material injury recur?

Applicants must provide evidence that in the absence of the measures, the dumped or subsidised goods would cause, or be likely to cause, material injury to the Australian industry producing the goods in question. In considering this question applicants should provide information on key indicators such as profitability, price trends, and market share.

The application should provide:

a. Information on market trends for the goods in question for the last three years, addressing in particular:

i. volume and value of imports and sources of imports

As detailed in section 4.(i).c. above the combined volume exported to Australia from countries subject to the original investigation was over 40,000 tonnes in the last 12 months (April 2020 to March 2021), and these exports represented 85 per cent of the total imports according to TradeData International. Whilst these volumes may include volume exported by Tjiwi Kimia which is not the subject of existing Anti-Dumping measures and when their estimated volumes are removed, the total exports of the dumped goods to Australia is expected to be approximately 31,200 tonnes p.a. or 65 per cent of the imports.

The significant volume of like goods continuing to be exported to Australia from countries which are subject of the measures demonstrates that there is a persistent ability and will of the exporters to trade in the Australian market. The low prices seen in 2020 further demonstrate the exporters willingness to undercut the Australian market, and confirms that without a continuation of measures, injury will recur in the form of

volume loss and further price erosion.

ii. sales and market shares of all suppliers

Opal Australian Paper does not have access to the sales records of the dumped exports related to this continuation application, although export statistics obtained through TradeData International have been used to estimate the market share information contained in Confidential Table 2 below.

[Confidential Table]

iii. performance of the local industry, showing key indicators such as profits, price trends, investment, and employment.

Note that the proceeding section includes information previously submitted the Commission as part of other reviews/applications. All of Opal Australian Paper's confidential financial appendices for 2020 have been submitted with this application, and updated appendices for the first quarter 2021 will be submitted to the Commission once they have been completed.

Table 3 - Indexed table of Opal Australian Paper's sales quantities

Quantity	2016	2017	2018	2019	2020
All products					
Australian market	100	104.6	113.4	116.5	98.0
Export market	100	71.9	46.7	47.4	65.2
Total	100	90.8	85.1	87.2	84.1
Like goods					
Australian market	100	130.0	140.5	138.7	99.7
Export market	100	64.4	48.2	36.6	62.3
Total	100	108.5	110.3	105.3	87.5

Opal Australian Paper's domestic sales of A4 copy paper improved in 2016 and 2018 due to the imposition of measures in April 2017 on injurious exports from Brazil, China, Indonesia and Thailand. Volume decreased slightly in 2019 despite imposition of measures in April 2019 on injurious exports from Finland, Korea, Russia and Slovakia. Opal Australian Paper's domestic sales reduced significantly in 2020.

Opal Australian Paper along with all A4 copy paper manufacturers globally experienced a reduction in sales volumes in 2020 due to the impact of the COVID-19 pandemic, noting that all Australian market participants including manufacturers and exporters/importers will have been equally affected by the pandemic. The reduced market size means that the effect of injurious exports to Australia is even more detrimental to the domestic industry. As a consequence of lost domestic market volumes during the 2020 year, and in addition to forced 'market activity' downtime on machines, Opal Australian Paper has been forced to increase its exports of the like goods internationally which are less profitable due to highly commoditised, oversupplied and brand agnostic global markets.

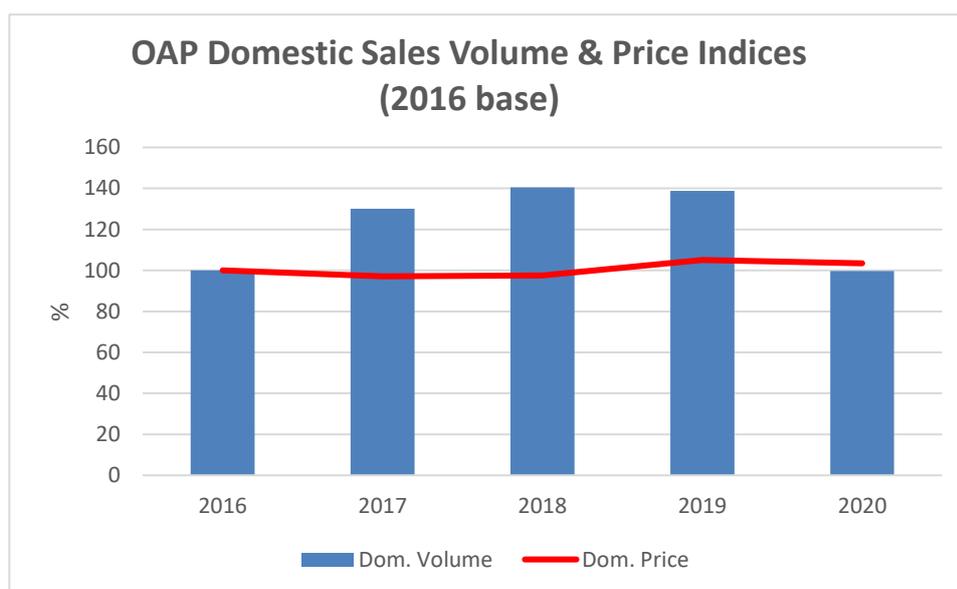
Table 4 - Indexed table of Opal Australian Paper's sales values

Value	2016	2017	2018	2019	2020
All products					
Australian market	100	101.8	110.2	115.3	94.9
Export market	100	64.5	55.3	52.5	58.5
Total	100	86.9	88.3	90.2	80.4
Like goods					
Australian market	100	126.3	136.9	145.8	103.1
Export market	100	65.8	54.8	44.8	65.0
Total	100	110.2	115.1	119.0	93.0

Opal Australian Paper's domestic sales values of A4 copy paper improved between 2016 and 2019 due to the imposition of measures in April 2017 on injurious exports from Brazil, China, Indonesia and Thailand, as well as the imposition of measures in April 2019 on injurious exports from Finland, Korea, Russia and Slovakia. Opal Australian Paper's domestic sales reduced significantly in 2020.

The following graph contrasts Opal Australian Paper's sales volumes with average domestic selling prices for A4 copy paper from 2016 to 2020.

Graph 3 – Opal Australian Paper's A4 copy paper domestic sales volumes and selling price



It is noteworthy that after experiencing some temporary relief from the injurious impact of dumping in terms of volumes (with only marginal price recovery) since measures have been in place, that volumes and pricing have returned close to levels seen in 2016; a period significantly affected by dumped and subsidised exports. During the Commission's Investigation No. 341 it was established that in 2015 approximately 52 per cent of the Australian market was supplied by dumped exports.

It has been established by the Commission in Investigations 341 and 463 that a contracting A4 copy paper market creates a situation where market share can only be retained or increased by winning supply volume at competitive prices. Therefore the more dramatic contraction in apparent consumption in 2020 increased the importance

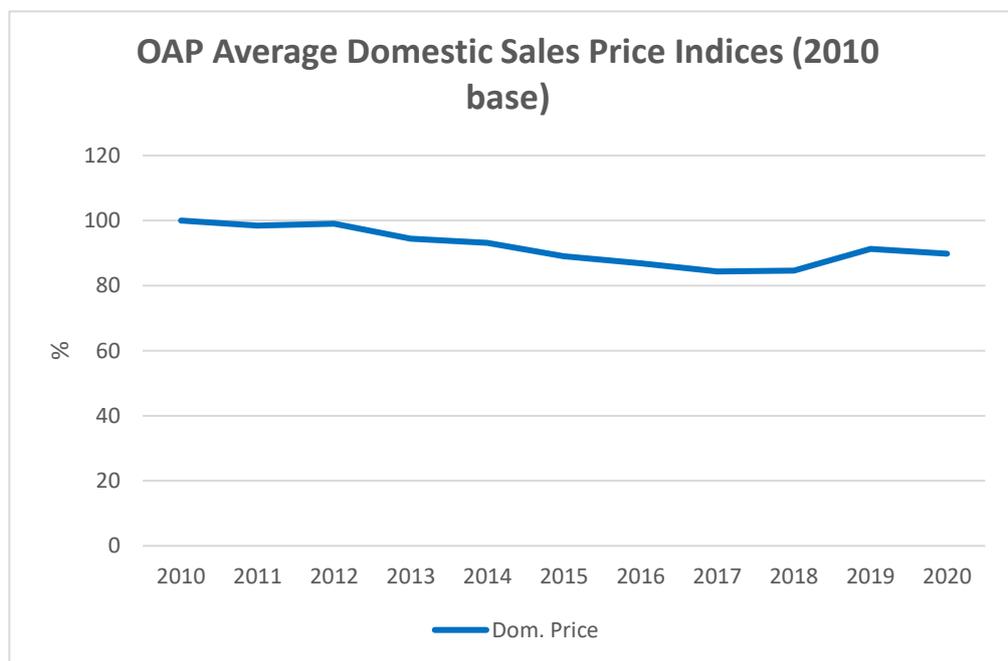
of volume retention and has further increased market competitiveness in terms of pricing.

Whilst all market participants will have been equally impacted by the market contraction in terms of market share in 2020, the fact that there has been little price recovery over the injury analysis period indicates that the market is still affected by dumping.

The impacts of the Covid 19 pandemic on all market participants cannot explain why price recovery has not been experienced by Opal Australian Paper over the long term (since 2010 when Opal Australian Paper alleges that dumping in the market had commenced with peak volumes in 2014), and following the imposition of measures in 2016 and 2019.

The following graph highlights Opal Australian Paper's average domestic selling prices for A4 copy paper from 2010 to 2020.

Graph 4 – Opal Australian Paper's A4 copy paper domestic selling price



Opal Australian Paper has the capacity to supply the entire domestic demand for A4 copy paper with an installed capacity of approximately 200,000 tonnes per annum. However, due to continued import competition at dumped prices since 2015 (and alleged by OAP to have commence even earlier), Opal Australian Paper has had to sell this production to the less lucrative export markets to maintain volume throughput in its production facilities. Subsequently products like Reflex cannot benefit from the high domestic brand awareness as a result of sustained marketing, and therefore must forego the premium price they should achieve in the local market.

Because of the high level of investment and relatively high fixed costs which do not vary in proportion to production levels, the total volume of production is, wherever possible, maintained to give high equipment utilisation, with any volume above the domestic cut sheet paper sales sold in other markets.

Table 5 - Index of Opal Australian Paper's profit variations

Product	2016	2017	2018	2019	2020
A4 0-20%	100*	-3.67	219.61	57.22	574.06
A4 21-79%	100	91.04	47.63	35.56	-8.62
A4 80-100%	100	32.23	-34.75	-76.77	-163.06
Total	100*	-410.24	3223.50	1486.85	8748.56

Notes:

1. *In the 2016 base year, Opal Australian Paper experienced negative profit on the like goods, therefore the index appears to show an increase in profit in category 1 and the total compared to 2016 levels. In fact profit has decreased by the same factor. i.e. negative numbers point to a positive unit profit (unit gain), and positive numbers refer to a negative unit profit (unit loss).
2. Domestic only.
3. Years ending December.

In 2016 the unit profit on the sale of the like goods was a small negative number i.e. a small unit loss. Profit increase in 2017 resulted in a very modest unit gain per tonne sold. Unit profit from 2018 to 2020 was significantly worse than the small unit loss in 2016, with losses in 2020 over 8,700 per cent worse than 2016 (albeit from a low base).

Table 6 - Index of Opal Australian Paper's profitability variations

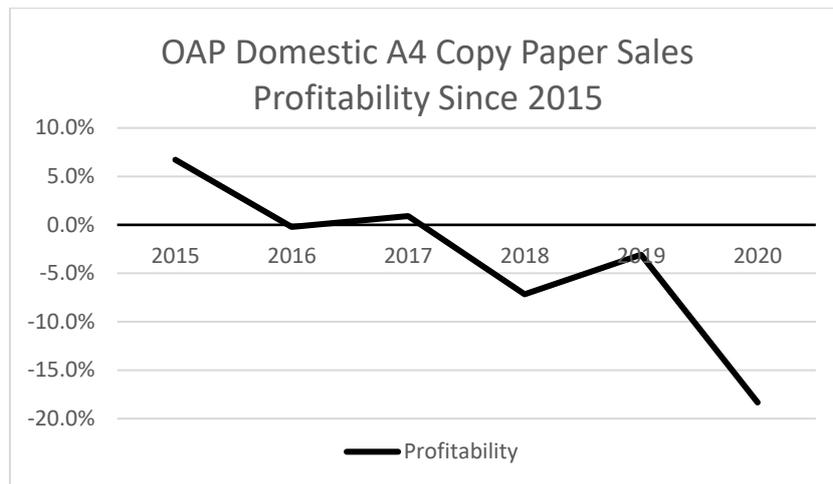
Product	2016	2017	2018	2019	2020
A4 0-20%	100*	-3.76	223.52	53.64	546.46
A4 21-79%	100	88.23	47.36	35.51	-8.81
A4 80-100%	100	33.44	-35.79	-81.50	-175.92
Total	100*	-422.50	3307.90	1415.27	8459.28

Notes:

1. *In the 2016 base year, Opal Australian Paper experienced negative profit on the like goods, therefore the index appears to show an increase in profit in category 1 and the total compared to 2016 levels. In fact, profitability has decreased by the same factor. i.e. negative numbers point to a positive profitability, and positive numbers refer to a negative profitability
2. Domestic only
3. Years ending December.

Opal Australian Paper's decline in profitability followed the trend in unit profit between 2016 and 2020. Opal Australian Paper's profitability throughout the injury analysis period was between -18.3 per cent (2020) and 0.9 per cent (2017), i.e. less than 1 per cent or negative - a level insufficient to consider reinvestment in the goods the subject of the application.

Graph 5



b. Information addressing the likelihood of material injury in the absence of the anti-dumping measures. Alternative sources of export supply that may have arisen following imposition of the measure or production capacity in the country concerned, may be relevant.

The threat of material injury to the Australian industry remains high, and is supported by the fact that actual material injury continues to be experienced on account of the continued exportation of approximately 31,200 tonnes of dumped goods over the past 12 months.

The SEF released by the Commission in relation to the ongoing variable factors review No. 551, has preliminarily determined that all exporters had increased the margin of dumping of the review period excluding UPM China, which had slightly reduced its margin of dumping.

The ongoing exportation of significant volumes of dumped goods, at rates which have increased since the original investigation, in the context of clear and unequivocal injury to the domestic industry necessitates the continuation of the dumping measures against exporters in Brazil, China, Indonesia and Thailand.

In 2015 – the last year that the Australian industry was exposed to the dumping without measures in place, the Commission found that approximately 52% of the market was being supplied by dumped exports. The continued flow of the dumped goods, as well as the maintained distribution networks and the regional overcapacity all point to the fact that removal or sunseting of the measures will impact the domestic industry demonstrably.

It is the view of Opal Australian Paper that the continued imposition of adequate and appropriate Anti-Dumping measures is integral to the continuity of the domestic industry. Without appropriate remedies to address the proliferation of the unfair trade, the domestic production would inevitably be forced into closure impacting around 900 full time employees directly connected with the production of the like goods.

5. The applicant must provide details of the current anti-dumping measure(s) the subject of this continuation application, including:

- tariff classification
- the countries or companies

- **specified date of publication of the measure**

The imported products the subject of this continuation 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 continuation 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, OAP requests that the Anti-Dumping Commission initiate a continuation inquiry related to 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.

Provision of data

Industry financial data must, wherever possible, be submitted in an electronic format.

- The data should be submitted on a media format compatible with Microsoft Windows.
- Microsoft Excel, or an Excel compatible format, is required.
- If the data cannot be presented electronically please contact the Commission’s client support section for advice.

Lodgement of the application

This application, together with the supporting evidence, must be lodged in the manner approved by the Commissioner under subsection 269SMS(2) of the Act. The Commissioner has approved lodgement of this application by either:

- 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.

Public Record

During an investigation 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.

At the time of making the application both a confidential version (for official use only) and non-confidential version (public record) of the application must 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. If you cannot provide a non-confidential version, contact the Commission’s client support section for advice.