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27 October 2021

The Commissioner  
Australian Anti-Dumping Commission  
GPO Box 2013  
Canberra, ACT, 2600

By email to: [investigations@adcommission.gov.au](mailto:investigations@adcommission.gov.au)

For the attention of Gavin Crooks, Assistant Director, Investigations

**Anti-Dumping Investigation No. 583 under ADN 2021/072 in respect of alleged dumping of A4 copy paper exported to Australia from the Republic of Indonesia by PT. Pabrik Kertas Tjiwi Kimia Tbk ('Tjiwi Kimia').  
Second submission on causation of material injury including response to Opal Australia Paper's submission dated 7 September responding to our submission of 12 August 2021– FOR THE PUBLIC RECORD**

We refer to the letter dated 7 September 2021 from Opal Australia Paper ('OAP') on the public record of Investigation No 583 as document Number 16 which was responding to the submission dated 5 August 2021 by our client, PT Pabrik Kertas Tjiwi Kimia (published on the EPR on 12 August 2021 as document Number 11).

**1. The submission by OAP dated 7 September 2021 - Doc 16 on EPR583 ('Opal's response')**

Our submission on 5 August argued that any injury experienced by the Australian industry producing A4 copy paper can be attributed to a range of other factors, including

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- Overcapacity of OAP in relation to the size of the domestic market and OAP's utilization of capacity;
- Decline in demand in the Australian market;
- The impact of the Covid 19 pandemic on demand;
- Competition from other imports, including:
  - Import competition from an exporter partly owned by OAP's parent company;
  - Competition from non-dumped imports;
- A deterioration in OAP's bargaining power arising from structural changes to the distribution channels for copy paper;
- The inadequacy of OAP's management strategy for responding to its overcapacity.
- The loss of a large volume of export sales previously made to the USA;
- The loss of a key contract by OAP to supply paper to Officeworks for its Keji brand;

In responding to these factors requiring a non-attribution analysis, OAP has stated that the claim that injury has been caused by other factors is a "baseless claim". OAP has labelled some of the arguments related to other causal factors as "purely speculative and not supported by evidence". This submission addresses OAP's response to our arguments about non-attribution of other causal factors.

## 2 The obligations of the Commissioner with respect to investigating causation or injury and ensuring that injury caused by other factors is not attributed to the allegedly dumped imports

All of the factors that we described in our submission dated 5 August are "relevant economic factors having a bearing on the state of the industry". Section 269TAE(1) allows the Commissioner and the Minister to take them into account and a failure to take them into account would put Australia in breach of Article 3.4 of the WTO *Anti-Dumping Agreement*.

The obligation goes further than merely taking the matters into account under sections 269TAE(1) and ADA Article 3.4. In making a determination in this case whether imports from Tjiwi Kimia have caused, are causing or threatening material injury to OAP, the Commissioner and the Minister are obliged under section 269TAE(2A) to consider whether any injury to OAP is being caused or threatened by a factor other than the imports from Tjiwi Kimia and must not attribute any injury arising from any such factor to the imports from Tjiwi Kimia. Our submission dated 5 August 2021 made known to the investigating authority several factors other than the allegedly dumped imports from Tjiwi Kimia which are injuring OAP at the same time as the allegedly dumped imports from Tjiwi Kimia. Failure to conduct a non-attribution analysis in relation to each of the other factors raised in our submission of 5 August 2021 would breach section 269TAE(2A) and would also put Australia in breach of Article 3.5, 2<sup>nd</sup> sentence of the WTO *Anti-Dumping Agreement*.<sup>1</sup>

## 3. Decline in Quantity demanded in the Australian market

OAP and Tjiwi Kimia appear to agree that the quantity of A4 copy paper demanded in the Australian market has decreased during the period commencing 1 January 2017.<sup>2</sup>

<sup>1</sup> See *European Communities – Anti-Dumping Duties on Malleable Cast Iron Tube or Pipe Fittings from Brazil*, Report of the AB, WT/DS219/AB/R, adopted 18 August 2003 ('*EC - Tube or Pipe Fittings*') at para 175; and also the reference to this case in our submission of 5 August 2021, doc EPR583-11.

<sup>2</sup> See Paper Australia Ltd in its Application for Investigation 583 (Doc EPR583-001 on EPR583) at pp21-23 including Graph A-4.1. See PT Pabric Kertas Tjiwi Kimia in its Submission dated 5 August 2021 (Doc EPR583-11 on EPR583) at pp5-6. See also ADC, Australian Industry Verification Report in Investigation 588 published on the EPR 18 October 2021 at EPR doc no 588 at para 5.6.5.2



However, OAP is emphatic that our claim that injury to OAP is caused by factors other than dumped imports, including the decline in the size of the Australian market, is baseless. To support its view that the declining size of the Australian market is not a cause of injury to OAP, OAP quoted from the ADC finding in REP547:

“The Commission considers the declining size of the Australian market contributes to increased price competition and competition for market share.”<sup>3</sup>

Our submission was that the decrease in the overall size of the Australian market is an additional cause of injury which has to be separated from any injury arising from any dumping. The passage from REP547 quoted by OAP supports our submission that the declining size of the Australian market is a factor contributing to any injury suffered by OAP. Under section 269TAE(2A), the Commissioner is obliged to ensure that the injury caused by the reduction in the size of the Australian market is not attributed to the allegedly dumped imports from Tjiwi Kimia.

#### 4. The impact of the Covid pandemic on quantity demanded in the Australian market

OAP and Tjiwi Kimia appear to agree that the Covid pandemic caused a marked increase in the magnitude of the decrease in the quantity of A4 paper demanded in Australia during the investigation period.<sup>4</sup> Any indicators pointing to a deterioration of OAP’s position after the beginning of the lockdowns associated with COVID can largely be attributed to the decrease in demand arising from the COVID restrictions.

#### 5. The impact of non-dumped imports

OAP responded to our claim that the Commissioner had to ensure that any finding of injury did not attribute injury caused by non-dumped imports to the imports from Tjiwi Kimia by saying:

“Tjiwi Kimia has failed to demonstrate the volume of the non-dumped imports, where these are sold into the Australian market (if at all) and whether the non-dumped imports have contributed to lost sales by OAP. These suggestions are, again, mere speculation.”<sup>5</sup>

The most important point here is that all or virtually all of the imports of copy paper, other than the allegedly dumped imports from Tjiwi Kimia, are non-dumped imports. Any imports from exporters subject to Investigation 341 as reviewed under Investigation 547 (those from Brazil, China, Indonesia or Thailand) or Investigation 463 as reviewed under Investigation 551 (those from Austria, Finland, South Korea, Russia and Slovakia) can enter Australia only after payment of the applicable anti-dumping duties so they are necessarily non-dumped imports. We are instructed that there is a very small volume of imports from a new source which not having been found to be dumped should at present be regarded as non-dumped imports.

The Consideration Report, CON583, contains some information about the proportionate volume of imports from various exporters.<sup>6</sup> Figure 3 “Australia’s A4 copy paper market” shows the percentage market share of (1) the Australian industry which is OAP, (2) Indah Kiat and Pindo Deli, (3) Paper Force (for 2016), (4) Tjiwi

<sup>3</sup> See Paper Australia Ltd in its submission 7 September 2021 in document EPR583-016, at p2.

<sup>4</sup> See Paper Australia Ltd in its Application for Investigation 583 (Doc EPR583-001 on EPR583) at p27 saying that all A4 copy paper manufacturers experienced a decrease in sales because of the pandemic. .

<sup>5</sup> See Submission of Opal Australian Paper dated 7 September 2021, doc EPR583-16, at p2.

<sup>6</sup> Australian Anti-dumping Commission, Consideration Report CON583 dated 17 May 2021.



Kimia, (5) Countries not subject to measures; and (6) Countries subject to measures.<sup>7</sup> Figure 3 represents the imports from Tjiwi Kimia as increasing from 2016 to 2018 and then staying at about the same level from 2018 to 2020, though with a small increase from 2018 to 2019 and a small decrease from 2019 to 2020. Figure 3 shows that from 2016 to 2018 as the market share of imports from Tjiwi Kimia had a modest increase, the market share of OAP had a much larger increase. OAP's market share stays at about the same level from 2018 to 2019. Then from 2018 to 2020, OAP does have a significant loss of market share. Figure 3 shows that at the same time as OAP suffered a loss of market share, there is no increase in imports from Tjiwi Kimia, but there is a significant increase of imports from countries subject to measures, all of which would have been subject to anti-dumping duties so can be regarded as *non-dumped* imports.

To further consider the significance of the effects of non-dumped imports on the state of the Australian industry, the Commission has access to information on the volumes of imports from various sources. We looked to OAP's own estimates of the size of the total Australian market as 165,000 tonnes in 2019, and 134,000 tonnes in 2020,<sup>8</sup> and also looked to estimates of imports available from Industry Edge, a publication widely used by participants in the industry. These indicate that imports constituted an estimated 34,500 tonnes out of an estimated total supply of 165,000 tonnes to the Australian market in 2019 and an estimated 43,500 tonnes out of an estimated total supply of 134,000 tonnes to the Australian market in 2020. In both years, the biggest source of imports was China. Those imports from China could not have entered without payment of anti-dumping duties, so they were non-dumped imports. Also, in both years, the majority of imports were non-dumped imports from countries other than Indonesia upon which anti-dumping duties must have been paid. These volumes of undumped imports are quite significant in relation to the overall size of the Australian market and in relation to the volume of sales by OAP.

Given the significance of the volumes of non-dumped imports, the Commissioner is obliged to ensure that any injury arising from non-dumped imports is not attributed to the allegedly dumped imports.<sup>9</sup>

## 6. OAP's diminished bargaining position due to structural changes in the distribution of A4 copy paper

Opal indicated in its response to our submission that our claim regarding the impact of structural changes in the distribution market was "also speculative and not supported by any evidence." Despite Opal, in effect, denying that its trading position is affected by structural changes in the market, it clearly is. The Commission must consider this factor and must ensure that any injury caused by the structural changes in the market are not attributed to the allegedly dumped imports.

As the total quantity demanded in the Australian market has declined, participants in that market have faced increased competition and in such a market, it has been natural that some participants seek to leave the

<sup>7</sup> Australian Anti-dumping Commission, Consideration Report CON583 dated 17 May 2021, page 18, Figure 3, "Australia's A4 copy paper market".

<sup>8</sup> These estimates of the size of the Australian market are drawn from Paper Australia Ltd in its Application for Investigation 583 (Doc EPR583-001 on EPR583) at pp21-23 including Graph A-4.1.

<sup>9</sup> In REP341, the ADC found that imports by Central National Australia Pty Ltd from Phoenix Pulp & Paper Corporation in Thailand were one of the sources of dumped imports contributing to the injury of OAP. It is not necessary to discuss that point further except to say that if the ADC is aware of any imports from Phoenix Pulp & Paper Corporation during the investigation period, they would be subject to anti-dumping duties and be non-dumped imports so the Commission would need to ensure that any injury caused by those imports is not attributed to imports from Tjiwi Kimia.



market and others seek to become bigger players in the market and that is what has happened. It is clearly demonstrated by the facts, including these facts set out below:

- In 2016, Opal acquired the business of Edwards Dunlop Office Papers. In its press release at the time, Opal stated “Over time, Australian Paper will be replacing products that are currently imported, with locally manufactured, competitively priced office paper.”<sup>10</sup> That indicates that Opal’s purpose in acquiring the distribution business of Edwards Dunlop was to compete against imports and capture market share from importers.
- In 2017, private equity firm Platinum Equity acquired the Australia and New Zealand business of Staples from its US parent company,<sup>11</sup> and later that year re-branded the business as Winc.<sup>12</sup>
- In 2017, Platinum Equity also acquired Office Depot’s Office Max business in Australia and subsequently merged the Office Max business into the Winc Australia business.<sup>13</sup>
- In 2018, Complete Office Supplies (‘COS’) acquired the distribution business of Lyreco.<sup>14</sup>
- In 2019, COS acquired the distribution business of Vital Office.<sup>15</sup>

Therefore, our claims that the changes in the market have occurred are clearly not speculative and are supported by evidence.

In relation to the impact of the changes in the distribution market on the bargaining power of OAP, useful evidence may be drawn from the behaviour of market participants and from the testimony of market participants. In particular, the testimony of OAP itself indicates that the market consolidation has resulted in a decrease in the bargaining power of OAP. In the application for this investigation, OAP referred to the relatively small number of key contract resellers and retailers selling cut sheet paper in Australia and stated:

“This creates a highly concentrated procurement dynamic which places the balance of power firmly in the hands of the reseller.”<sup>16</sup>

<sup>10</sup> See <https://www.print21.com.au/news/aust-paper-buys-bj-ball-s-deop>

<sup>11</sup> See Leon Spencer, “Staples A/NZ to rebrand after private equity buyout”, 14 March 2017, (published by IDG Communications Pty Ltd on website [www.arnnet.com.au](http://www.arnnet.com.au)) at [Staples A/NZ to rebrand after private equity buyout - ARN \(arnnet.com.au\)](http://www.arnnet.com.au).

<sup>12</sup> See Leon Spencer, “Staples unveils new A/NZ brand name”, 07 August 2017 (published by IDG Communications Pty Ltd on website [www.arnnet.com.au](http://www.arnnet.com.au)) at [Staples unveils new A/NZ brand name - ARN \(arnnet.com.au\)](http://www.arnnet.com.au).

<sup>13</sup> See Leon Spencer, “Staples A/NZ buyer snaps up OfficeMax Australia in merger move”, 07 February 2018 (published by IDG Communications Pty Ltd on website [www.arnnet.com.au](http://www.arnnet.com.au)) at [Staples A/NZ buyer snaps up OfficeMax Australia in merger move - ARN \(arnnet.com.au\)](http://www.arnnet.com.au).

<sup>14</sup> See Andy Braithwaite, “Lyreco sells Australian business to COS”, 2 May 2018, (published by Office Products International Ltd on website [www.opi.net](http://www.opi.net)) at [Lyreco sells Australian business to COS | OPI - Office Products International](http://www.opi.net) viewed 12 October 2021; also Julia Talevski, “Office Max Australia bidder buys up rival office supplies player”, 3 May 2018 (published by Office Products International Ltd on website [www.opi.net](http://www.opi.net)) at [OfficeMax Australia bidder buys up rival office supplies player - ARN \(arnnet.com.au\)](http://www.opi.net).

<sup>15</sup> See Andy Braithwaite, “Australia’s COS acquires again” 19 August 2019 (published by Office Products International Ltd on website [www.opi.net](http://www.opi.net)) at [Australia’s COS acquires again | OPI - Office Products International](http://www.opi.net) viewed 12 October 2021.

<sup>16</sup> Paper Australia Ltd in its Application for Investigation 583 (Doc 583-001 on EPR583) at page 24, “Cut sheet paper in Australia is primarily sold through a handful of national key contract resellers and retailers. These include Winc (formerly known as Staples), Complete Office Supplies (COS), Wesfarmers, Woolworths, and Australia Post among others. This creates a highly concentrated procurement dynamic which places the balance of power firmly in the hands of the reseller.”



Again in Continuation Investigation 588, OAP has made submissions to the ADC about its negotiating position with its large customers. The Australian Industry Verification Report records that the negotiation of contracts between OAP and its larger customers had changed substantially because of the reduced bargaining position of OAP. It said:

“Verification of Paper Australia’s data also established that the nature of the agreements between market participants has changed. It is no longer the case that customers are obliged to enter into agreements that bind those customers to source their inventory from Paper Australia for any fixed period. This, according to Paper Australia, causes it to be vulnerable to customers making decisions to switch suppliers if Paper Australia does not agree to accept prices that are comparable to those offered by the subject exporters.”<sup>17</sup>

## **7. OAP’s overcapacity and OAP’s difficulties in utilizing its capacity**

OAP In its response to our submission dated 5 August, submitted:

“OAP rejects the assertion that the over-capacity of the Australian industry can be a cause of injury. Rather it is the Australian industry’s inability to displace imports that are at dumped prices that has caused the underutilization of the industry’s production capacity.”

I believe that it is not in dispute between OAP and Tjiwi Kimia that, in this business, fixed costs are a high proportion of total costs so the reduction in the total quantity demanded in the market means that the spreading of the fixed costs across a smaller volume has a significant impact on the profitability of the business.

However, it is necessary to face the fact that OAP has a production capacity that is greater than the total sales in the Australian market. Even if there were no imports at all, dumped or undumped, and OAP supplied the entire Australian market, OAP would still have underutilized production capacity. The only thing that can enable OAP to fully utilize its production capacity is for OAP to make regular, sustainable and profitable export sales. So the statement that “it is the Australian’ industry’s inability to displace imports that are at dumped prices that has caused the utilization of the industry’s production capacity” cannot be true. Even if OAP did displace all imports, it would still have underutilized production capacity unless it could make export sales to lift the level of utilization.

## **8. OAP’s failed strategies to utilize its capacity to produce quantities vastly in excess of the quantity demanded in the Australian market**

The behaviour of OAP over the years indicates that its main strategy for dealing with the situation of having a production capacity vastly in excess of the size of the total Australian market has been to charge higher prices in the Australian market and to charge considerably lower prices in export markets. It is a strategy of maximizing prices and profits in the Australian market paired with selling at prices intended to cover marginal costs in other countries. This is price-discrimination, usually called dumping. Therefore, it is a strategy of dumping in foreign markets and accompanied by sales at higher prices and profit levels in the Australian market. The achievement of the higher price in Australia depends on serial anti-dumping applications to exclude imports of copy paper at prevailing world prices.

<sup>17</sup> ADC Verification team, Australian Industry Verification Report, published 18 October 2021, EPR-588, doc no 15, pp34-35



Information provided by OAP in this investigation and in submissions to Continuation Investigation 588 indicate that OAP receives lower prices from its export sales than it receives from its sales in Australia.<sup>18</sup> For example, in the Application, OAP stated:

“Opal Australian Paper has had to sell this production to the less lucrative export markets to maintain volume throughput in its production facilities.”

with the consequence that:

“products like Reflex ... must forego the premium price they achieve in the local market.”<sup>19</sup>

It is difficult to reconcile this admission that price levels for A4 Copy paper are lower in other countries than in Australia with the findings of several ADC investigations that exporters in no less than nine countries have been selling at higher prices in their home markets than in their export sales to Australia. In reality, OAP is using anti-dumping applications to insulate it from the competitive world price.

In fact, OAP has indicated that its export sales are less profitable than its domestic sales. The Australian Industry Verification Report in Investigation 588 records:

“Paper Australia also highlighted that the reduced size of the Australian market required it to seek out trade with export markets which were less profitable.”<sup>20</sup>

It appears that OAP struggles to make any profit at all on export sales. The same Australian Verification Report in Investigation 588 (verifying information submitted by OAP for the period ending 31 March 2021) states:

“Paper Australia has claimed that the contraction in the Australian market has required it to seek alternative (export) markets in an effort to maintain production levels. However, as these alternative markets attract prices that are lower than the Australian market, *these export sales are currently also not profitable.*” (emphasis added)<sup>21</sup>

This must be caused at least in part by OAP having rising costs.<sup>22</sup> Even as OAP is having difficulty competing on the world market, its costs are rising more than its competitors costs,<sup>23</sup> making it even harder for it to compete sustainably in export markets. This appears to have led OAP to the conclusion that the only way for their business to survive is to artificially inflate prices in Australia by excluding imports from the Australian market by seeking anti-dumping duties against every source of imports.

### **8.1 OAP’s strategy to utilize its excess capacity by dumping into the USA market and the USA application of anti-dumping duties to OAP exports to the US market**

In OAP’s response (Doc 583-016) to our earlier submission (Doc 583-11), OAP complained that we were arguing on the basis of behaviour in the US market that was over 5 years ago. We do not wish to argue with OAP about the dates and timing of their previous exports to the US market and the imposition by the US of anti-dumping duties on OAP’s exports to the US. We are not arguing that the loss of the exports to the US

<sup>18</sup> See Paper Australia Pty Ltd, Application in Investigation 583 at p27: “its exports ports to internationally (sic) which are less profitable due to highly commoditised, oversupplied and brand agnostic global markets.”

<sup>19</sup> See Paper Australia Pty Ltd, Application in Investigation 583 at p29.

<sup>20</sup> Australian Industry Verification Report in Investigation 588 (doc 588-015) at p33.

<sup>21</sup> Australian Industry Verification Report in Investigation 588 (doc 588-015) at p36.

<sup>22</sup> Australian Industry Verification Report in Investigation 588 (doc 588-015) at para 6.5.1 on pp35-36.

<sup>23</sup> Australian Industry Verification Report in Investigation 588 (doc 588-015) at para 6.5.1 on pp35-36.



market in 2015 was a cause of injury that occurred during the investigation period for this Investigation number 583 between 1 April 2020 and 31 March 2021. We are arguing that the behaviour with respect to the US market is evidence supporting our arguments about OAP's strategy for dealing with its situation of excess productive capacity, and its strategy of artificially inflating the price level in Australia.

In its response (Doc 583-016), OAP did not disagree with the key point we made in our submission of 5 August (Doc 583-011) that the volume of copy paper which Paper Australia Pty Ltd was exporting to the US was equivalent to between a quarter and a third of the total volume of the Australian market.<sup>24</sup>

As we said in our submission of 5 August 2021,

“It was a strategy of making low price sales to help cover its fixed costs without undermining its high pricing in Australian market.”

This behaviour is entirely consistent with the way that we have described OAP's strategy for dealing with the problem of over-capacity. The strategy did not work because OAP was caught out by the US anti-dumping authorities. It is one important example of OAP's strategy for dealing with its overcapacity being unsuccessful. Since then, OAP's strategy has not changed.

## 8.2 OAP exporting to other markets

In OAP's response (Doc 5830016) to our submission of 5 August (doc 583-011), OAP “rejects the assertions that the over-capacity of the Australian industry can be a cause of injury” and in support of its position, states that

“OPA has since [the loss of the export volumes to the US] directed exports to alternative markets in lieu of the US trade.

Our argument is not that the overcapacity is itself a source of injury, but that OAP's suffers injury as a result of its own failure to find a strategy for more fully utilizing its capacity and covering its fixed costs that would put it in a sustainable and competitive position in the markets in which it operates.

OAP has not in its letter of 7 September (doc 583-016) given any details about its exports to alternative markets. However, in its application in Continuation Investigation No 588, OAP has given some further information about its exports to alternative markets. It has stated that the prices received from export sales are lower than the prices received from sales in Australia and that the export sales are currently not profitable. (see section 8 above)

Therefore, while it is true that OAP has directed exports to alternative markets, it remains true that export sales have not so far been a viable strategy for making OAP profitable.

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<sup>24</sup> The volumes of 75,800 metric tons with a value of US\$61,359,000 in 2014 and 48,700 metric tons with a value of \$38,994,000 are set out in International Trade Administration of the US Department of Commerce, Fact Sheet, “Commerce Finds Dumping of Imports of Certain Uncoated Paper from Australia, Brazil, China, Indonesia, and Portugal and Countervailable Subsidization of Imports of Certain Uncoated paper from China and Indonesia”, January 2016. (downloaded from [Commerce Finds Dumping of Imports of Certain Uncoated Paper from Australia, Brazil, China, Indonesia, and Portugal and Countervailable Subsidization of Imports of Certain Uncoated Paper from China and Indonesia \(trade.gov\)](#) on 26 October 2021).





### 8.3 OAP's strategy to utilize its excess capacity by supplying Officeworks for its Keji brand.

In our submission of 5 August (doc 5830011), we also referred to OAP having failed to solve its excess capacity problem by selling paper to Officeworks for the Keji brand, and to the loss of that contract in 2020 being another factor causing any loss to OAP. We said there:

“During 2020, Paper Australia lost the contract to supply paper to Officeworks for the Keji brand. Officeworks awarded the contract to UPM in China. This event damaged Paper Australia's efforts to increase volume so as to be able to help it cover its fixed costs. It caused Injury to Paper Australia over the same period as the alleged dumping by Tjiwi Kimia.”

We understand that at the end of the investigation period on 31 March 2021, UPM was still supplying Officeworks.<sup>25</sup> We emphasize that at that time imports from UPM were levied with anti-dumping duties, so this substantial volume of paper supplied to Officeworks by UPM constituted undumped imports. The ADC must assess whether all non-dumped imports caused injury to OAP and if so the ADC must treat them as another cause of injury which must not be attributed to the imports from Tjiwi Kimia.

We observe that OAP's behaviour in seeking this contract and winning it during some period of time is perfectly consistent with the way we have described OAPO's strategy of making low cost sales in ways that do not undermine its pricing in the Australian market.

If you have any questions or would like any further information, please let me know.

Yours Sincerely,

Dr Brett G Williams

Principal, Williams Trade Law

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<sup>25</sup> We note that submissions to Investigation 588 indicate that UPM lost the contract to OAP in April 2021. See Letter dated 9 August 2021 from Minter Ellison acting for UPM Asia Pacific Pte Ltd (doc EPR588-004) p1; and letter dated 3 September 2021 from Minter Ellison acting for UPM Asia Pacific Pte Ltd (doc EPR588-006) p2, saying that UPM was advised on 7 April 2021 that Officeworks would be moving the contract to OAP.