



**Opal Australian Paper**

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A member of the Nippon Paper Group

**Public File**

29 November 2021

Mr Gavin Crooks  
Assistant Director  
Investigations  
Australian Anti-Dumping Commission  
GPO Box 2013  
Canberra ACT 2601

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

Dear Mr Crooks

**Investigation No. 588 – A4 copy paper exported from Indonesia – submission by April Far East Malaysia Sdn Bhd**

I. Introduction

We refer to the submission by April Far East Malaysian Sdn Bhd “April” concerning normal values and adjustments (EPR Document No. 017).

The submission addresses a number of matters that Opal Australian Paper (“OAP”) seeks to comment on.

II. Australian market

April’s submission acknowledges the decline in demand for A4 copy paper “the goods” in 2020. This contraction in demand in the Australian market has principally occurred due to the impact of the Covid 19 pandemic. OAP agrees with April that the fall in demand has occurred and that OAP has excess production capacity available to it. OAP submits, however, that the injurious effects of dumping where normal values are not reflective of current costs and prices, has a greater impact in a contracting market (than a market that is expanding).

Based upon the market numbers quoted by April in its commentary about the Australian market, OAP certainly does not have 85 per cent market share and, nowhere near approaching 90 per cent. April’s assertions are somewhat exaggerated.

April’s comments concerning OAP’s export sales are misguided. It is well understood that in order to secure sales in export markets, the exporter must accept the prevailing price in that export market. As OAP’s domestic market has contracted, OAP seeks to sell goods on the export market to maintain production efficiencies. The Anti-Dumping Commission (“the Commission” is well equipped to assess the impact of the injurious dumping on the economic performance of the Australian industry.

III. Adjustments to pulp price in CTM

April contends that as there was no adjustment to its pulp price in Review Investigation No. 551 there is no need for an adjustment in the current investigation. This contention does not routinely apply.



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The Commission may determine in the current inquiry that April 's pulp price is not representative of the benchmark and therefore an adjustment may be required.

It does not automatically follow that because no adjustment was made in a prior inquiry that there is no need for an adjustment in subsequent investigations.

The Commission can utilise information from an industry source to establish an appropriate benchmark and if it is determined that April's affiliate PT Riau Andalan Kertas ("RAK") has purchased pulp below the benchmark, a pulp cost adjustment is required.

OAP disagrees with April's contention that "there have been no material changes in the Indonesian A4 Copy Paper market since the review period in Review 551 and the review period in this inquiry" inferring that no adjustment to the cost of pulp is required. OAP anticipates the Commission will re-visit the benchmark and contrast it with RAK's pulp cost to determine whether an appropriate adjustment is required in the current investigation.

If you have any questions concerning this submission, please do not hesitate to contact me on 0425 619 677.

Yours sincerely

A handwritten signature in black ink that reads "M. Decarne".

Matt Decarne  
Trade Affairs Manager