



Ref.: 180/DAGLU.6/SD/03/2022

Jakarta, 4 March 2022

Director, Investigations Unit 1
Anti-Dumping Commission
GPO Box 2013, CANBERRA ACT 2601
AUSTRALIA

Received 4 March 2022

Attention: Dr. Bradley Armstrong PSM
Anti-Dumping Commissioner

Subject: Government of Indonesia's comments concerning the Statement of Essential Facts No. 588


Dear Mr. Armstrong,

Regarding the publication of the Statement of Essential Facts ("SEF") No. 588 - Inquiry Concerning the Continuation of Anti-Dumping Measures Applying to A4 Copy Paper Exported to Australia from inter alia The Republic of Indonesia, the Government of Indonesia ("GOI") hereby would like to express its comments before the Australia Anti-Dumping Commission ("AADC"), as the following:

1. The ongoing proceeding of the aforementioned anti-dumping measure should be initiated and conducted in accordance with the provisions of the Agreement on Implementation of Article VI of the GATT 1994 ("Anti-Dumping Agreement / ADA");
2. AADC shall commence the abovementioned proceeding based on the provisions stipulated in the Article 11.3 of the ADA;
3. It is stated in the SEF that all submissions as a response to SEF lodged after the prescribed time (11 January 2022) is not compulsory to be considered by the AADC. However, considering that paper product is an essential commodity for our country, we expect AADC will conduct a fair, transparent, and objective inquiry;
4. In accordance with the ADA, there are several matters that must be demonstrated by the anti-dumping investigation authority in conducting a fair, transparent, and objective proceeding, including examining all relevant evidence before the authority, finding determination based on facts and not merely on allegation, conjecture or remote possibility, and providing opportunities for all interested parties to deliver their interests.

In conclusion, GOI at this opportunity reaffirms its position to ask the AADC to conduct the investigation in a fair, transparent, and objective manner. Thank you for your attention.

Yours sincerely,


Natan Kambuno
Director of Trade Defense

Cc:

1. Director General of Foreign Trade, Ministry of Trade of Indonesia;
2. Ambassador of the Republic of Indonesia to Australia in Canberra;
3. Director of Pacific and Oceania Affairs, Ministry of Foreign Affairs of the Republic of Indonesia;
4. Secretary of Directorate General of Foreign Trade, Ministry of Trade of Indonesia;
5. Indonesian Trade Attaché in Canberra, Australia.