

NON-CONFIDENTIAL

July 10, 2019

Ms Jaclyne Fisher
Panel Member
Anti-Dumping Review Panel
GPO Box 2013
Canberra ACT 2601

Re: Review of Minister's Decision – Steel Pallet Racking (ADN 2019/45)

Dear Ms Fisher,

We have considered the ADRP's proposal to conduct a review of the Minister's Decision published on the ADRP website 28th June 2019 (Reference 2019/103) along with the grounds considered to be reasonable grounds for the Reviewable Decision not being the correct or preferable decision.

Based on our experience and knowledge of the industry and of Steel Pallet Racking itself, we are supportive of grounds raised and in particular we affirm the following:

- Steel Pallet Racking is not able to be matched to the "description of goods" the subject of the Reviewable Decision (ADN 2019/45); and
- The goods as described in the "description of goods" the subject of the Reviewable Decision (ADN 2019/45) do not actually exist, are not able to be manufactured; and
- Steel Pallet Racking that actually exists in Australia, including that which is manufactured in Australia, is correctly described and accurately represented below:

Steel pallet racking storage system comprising upright frames perpendicular to the aisles and independently adjustable, positive locking pallet beams parallel to the aisles, spanning between the upright frames, and designed to support unit load actions.

The system and/or the parts of the system (whether assembled or unassembled) are not of dimensions that can be adjusted as required.

Any adjustment capacity of the system is distinctly restricted from being adjusted "as required" by incremental limitation, engineering limitation, other physical limitation and/or applicable standards. Every required adjustment that does not exactly match the incremental limitation of the system and fall within the engineering and physical limitations of the system (and fall within the criteria of any applicable standard that may form part of the requirement) cannot be performed or cannot be performed without remanufacture.

Yours Sincerely,



Brian Neil
Sales Manager