Australian Government
Anti-Dumping Review Panel

Application for review of a Ministerial decision

Customs Act 1901 s 269ZZE

Use this form[1] to apply for review of a reviewable decision of the Minister (or his or her Parliamentary Secretary) made on or after 2 November 2015.

Any interested party[2] may lodge an application for review to the ADRP of a review of a ministerial decision.

All sections of the application form must be completed unless otherwise expressly stated in this form.

Fees
Your application must be accompanied by the application fee. Please provide a copy of your proof of payment with the application. Information about fees and refunds is on the ADRP website.

Time
Applications must be made within 30 days after public notice of the reviewable decision is first published.

Conferences
You or your representative may be asked to attend a conference with the Panel Member appointed to consider your application before the Panel gives public notice of its intention to conduct a review. Failure to attend this conference without reasonable excuse may lead to your application being rejected. The Panel may also call a conference after public notice of an intention to conduct a review is given on the ADRP website. Conferences are held between 10.00am and 4.00pm (AEST) on Tuesdays or Thursdays. You will be given seven (7) business days' notice of the conference date and time. See the ADRP website for more information.

[1] Form approved by the Senior Member of the Anti-Dumping Review Panel under section 269ZY *Customs Act 1901*.
[2] As defined in section 269ZX *Customs Act 1901*.

Further application information

You or your representative may be asked by the Panel Member to provide further information to the Panel Member in relation to your answers provided to questions 0, 0 and/or 12 of this application form (s269ZZG(1)). See the ADRP website for more information.

Withdrawal

You may withdraw your application at any time, by following the withdrawal process set out on the ADRP website.

In certain circumstances some or all of your application fee may be refunded if you withdraw your application. See the ADRP website for more information.

If you have any questions about what is required in an application refer to the ADRP website. You can also call the ADRP Secretariat on (02) 6276 1781 or email adrp@industry.gov.au.

PART A: APPLICANT INFORMATION

1. Applicant's details

Applicant's name: OneSteel Manufacturing Pty Ltd

Address: Level 6, 205 Pacific Highway, St Leonards NSW 2065

Type of entity (trade union, corporation, government etc.): Corporation

2. Contact person for applicant

Full name: [redacted]

Position: [redacted]

Email address: [redacted]

Telephone number: [redacted]

3. Set out the basis on which the applicant considers it is an interested party

The applicant for review was the applicant in relation to an application under section 269TB of the *Customs Act 1901* that led to the making of the reviewable decision – being the sole member of the Australian industry producing like goods.

4. Is the applicant represented?

~~Yes~~ **No**

If the application is being submitted by someone other than the applicant, please complete the attached representative's authority section at the end of this form.

Not applicable.

It is the applicant's responsibility to notify the ADRP Secretariat if the nominated representative changes or if the applicant become self-represented during a review.

PART B: REVIEWABLE DECISION TO WHICH THIS APPLICATION RELATES

5. Indicate the section(s) of the *Customs Act 1901* the reviewable decision was made under:

☒ Subsection 269TG(1) or (2) – decision of the Minister to publish a dumping duty notice

☐ Subsection 269TH(1) or (2) – decision of the Minister to publish a third country dumping duty notice

☐ Subsection 269TJ(1) or (2) – decision of the Minister to publish a countervailing duty notice

☐ Subsection 269TK(1) or (2) decision of the Minister to publish a third country countervailing duty notice

☐ Subsection 269TL(1) – decision of the Minister not to publish duty notice

☐ Subsection 269ZDB(1) – decision of the Minister following a review of anti-dumping measures

☐ Subsection 269ZDBH(1) – decision of the Minister following an anti-circumvention enquiry

☐ Subsection 269ZHG(1) – decision of the Minister in relation to the continuation of anti-dumping measures

6. Provide a full description of the goods which were the subject of the reviewable decision

The goods the subject of the reviewable decision were:

"Hot-rolled deformed steel reinforcing bar whether or not in coil form, commonly identified as rebar or debar, in various diameters up to and including 50 millimetres, containing indentations, ribs, grooves or other deformations produced during the rolling process.

"The goods covered by this application include all steel reinforcing bar meeting the above description of the goods regardless of the particular grade or alloy content or coating.

"Goods excluded from this application are plain round bar, stainless steel and reinforcing mesh."

7. Provide the tariff classifications/statistical codes of the imported goods

The goods are classified to the tariff subheadings in Schedule 3 to the *Customs Tariff Act 1995* specified below:

- 7214.20.00 (statistical code 47);
- 7228.30.90 (statistical code 49 (as of 1 July 2015, statistical code 40));
- 7213.10.00 (statistical code 42);
- 7227.90.90 (statistical code 42 (as of 1 January 2015 statistical codes 02 and 04)); and
- 7227.90.10 (statistical code 69).

8. **Provide the Anti-Dumping Notice (ADN) number of the reviewable decision**
   If your application relates to only part of a decision made in an ADN, this must be made clear in Part C of this form.

   Anti-Dumping Notice (**ADN**) No. 2015/133

9. **Provide the date the notice of the reviewable decision was published**

   19 November 2015

Attach a copy of the notice of the reviewable decision (as published on the Anti-Dumping Commission's website) to the application

A copy of the notice of the reviewable decision is attached as *Appendix A* to this application.

PART C: GROUNDS FOR THE APPLICATION

If this application contains confidential or commercially sensitive information, the applicant must provide a non-confidential version of the grounds that contains sufficient detail to give other interested parties a clear and reasonable understanding of the information being put forward.

Confidential or commercially sensitive information must be marked '**CONFIDENTIAL**' (bold, capitals, red font) at the top of each page. Non-confidential versions should be marked '**NON-CONFIDENTIAL**' (bold, capitals, black font) at the top of each page.

For lengthy submissions, responses to this part may be provided in a separate document attached to the application. Please check this box if you have done so: ☐

10. Set out the grounds on which the applicant believes that the reviewable decision is not the correct or preferable decision.

10.1 The Parliamentary Secretary, as the Minister's delegate[3], cannot reasonably find that the information supplied by the exporter, NatSteel Holdings Pte Ltd is reliable within the meaning of subsection 269TAC(7) of the *Customs Act 1901*[4]

In its submission dated 18 September 2015[5], the applicant for review, identified its concern with the reliability of the exporter, NatSteel Holdings Pte Ltd **(NatSteel's)**, cost to make information.

> "OneSteel notes the following comments of the Commission (Section 8.5):
>
> > "As set out in Section 3.2.3, it was explained to the Commission that during the period of investigation, NatSteel imported rebar to satisfy the domestic market while it was upgrading its furnace and rolling mill. It was also explained that NatSteel's accounting system assigned identical codes to imported rebar and rebar that was manufactured by NatSteel. As a result, the Commission was unable to determine the cost of goods, that is, the cost of production or manufacture of domestic sales, pursuant to Regulation 43(2) of the *Customs (International Obligations) Regulation 2015...*".
>
> "NatSteel's position concerning its costs were further commented upon by the Commission at Section 11:
>
> > *"For the purposes of this investigation, NatSteel was unable to differentiate in its recording system which costs related to imported bar and which costs related to its own production".*[6]

Accordingly, the applicant for review, submitted that the Commissioner's[7] treatment of this unreliable information was administratively unsound:

---

[3] The Minister for Industry, Innovation and Science has delegated responsibility with respect to operational anti-dumping matters to the Parliamentary Secretary, and accordingly, the Parliamentary Secretary is the relevant decision maker.

[4] Unless stated otherwise, all legislative references in this application are to the *Customs Act 1901*.

[5] EPR Folio 264/082 at pp. 1 – 3.

[6] *Ibid.*, at p. 1.

> *"NatSteel's costs do not reflect the actual costs to produce rebar by NatSteel during the investigation period. The costs are tainted via the inclusion of imported rebar costs. Therefore, the conclusion that the cost to make and sell information supplied by NatSteel is unreliable is inescapable. Applied here, the Commission is duty-bound to recommend to the Parliamentary Secretary that the information ought properly be considered unreliable and disregarded under s.269TAC(7). To not do so would put the Parliamentary Secretary's decision at risk of legal challenge on the basis that having regard to such patently and obviously inaccurate and unreliable information indicates that the Parliamentary Secretary has taken into account matters which are irrelevant to its consideration, or their veracity are so unreasonably tainted by doubt, that no reasonable decision maker would have taken such matters into account..."*[8]

Sub-regulation 43(2) of the *Customs (International Obligations) Regulation 2015*[9] provides as follows:

> *"**If**:*
>
> *"(a) **an exporter or producer of like goods keeps records relating to the like goods**; and*
>
> *"(b) the records:*
>
> *(i) are in accordance with generally accepted accounting principles in the country of export; and*
>
> *(ii) reasonably reflect competitive market **costs associated with the production or manufacture of like goods**;*
>
> *"the Minister must work out the amount by using the information set out in the records." [**emphasis added**]*

Applied here, the exporter fails under both the first and second limbs of the test.

Under the first limb, the exporter concedes, and the Commission agrees, that NatSteel's accounting system does not keep records of costs relating to the like goods sold into the domestic Singaporean rebar market. This is because the exporter assigns identical codes to imported rebar and rebar that was manufactured by NatSteel. In other words, the exporter cannot with any degree of accuracy determine the costs of production or manufacture of the "like goods", or indeed the goods under consideration. This is a prerequisite to the Parliamentary Secretary being able to determine a normal value under paragraph 269TAC(2)(c), specifically, the Parliamentary Secretary must be able to determine "the cost of production or manufacture of the goods in the country of export". Of course, that cannot be done with this exporter's records - as it cannot differentiate between the rebar "produced" by the exporter "in the country of export", and re-sold by the exporter following "importation" of the goods.

---

[7] References to the Commissioner or the Commissioner are references to the Anti-Dumping Commissioner and the Australian Anti-Dumping Commission.

[8] *Ibid.*, at p. 2.

[9] Unless stated otherwise, all regulatory references in this application are to the *Customs (International Obligations) Regulation 2015*.

Under the second limb, the Commissioner cannot reasonably recommend to the Parliamentary Secretary that this exporter's so-called "records" reflect "costs associated with the production or manufacture of like goods". In fact, the agreed evidence is that they reflect an amalgam of the exporter's costs of imported goods and goods produced by the exporter.

Finally, even if the Review Panel is satisfied that the first and second limbs of the test under sub-regulation 43(2) have been satisfied, then the Parliamentary Secretary is still bound by paragraph 269TAC(2)(c)(i) when determining a normal value, as the Commission was not able to reasonably satisfy the requirement that the costs reflect "the cost of production or manufacture of the goods in the country of export". Again, at best the cost reflects the costs of imported product, later resold, and possibly the costs of producing rebar.

Therefore, the Parliamentary Secretary erred:

- in using the exporter, NatSteel's, records in her determination of the exporter's costs of production or manufacture of the goods in the country of export; and
- in determining the normal value of the goods under paragraph 269TAC(2)(c).

10.2. Further, or in the alternative, the Parliamentary Secretary, has erred in her determination of the normal value under paragraph 269TAC(2)(c) by accounting for a "normalisation adjustment" to the exporter, NatSteel's, cost of production or manufacture of the goods in the country of export

In its submission dated 18 September 2015[10], the applicant for review objected to the making of a so-called "normalisation adjustment"[11].

In *Report No. 264*, the Commission clarified that the "normalisation adjustment" afforded to NatSteel was an adjustment to NatSteel's cost to make, and not an adjustment to that exporter's normal value.

Given that the Commission's justification for making this adjustment was due to certain costs associated with the upgrade activities undertaken by NatSteel in 2013, the applicant for review fails to understand on what basis the adjustment is made.

Permissible adjustments are available under subsection 269TAC(9). However, the Commission asserts that the so-called "normalisation adjustment" is not made under this provision.

Alternatively, as the Parliamentary Secretary has purported to determine the normal value for the goods under subsection 269TAC(2)(c), then the "normalisation adjustment" must satisfy the requirements under sub-paragraph (b)(i) of sub-regulation 43(2) that the "records" and therefore the costs, and any so-called adjustments to those costs:

> *"are in accordance with generally accepted accounting principles in the country of export".*

---

[10] EPR Folio 264/082 at pp. 5 – 6.

[11] NatSteel was deemed by the Commission to be a cooperative exporter of the goods under consideration from Singapore.

It is not clear to the applicant for review that this requirement of the regulation has been satisfied or even addressed (or indeed considered) by the Commissioner in his recommendation to the Parliamentary Secretary.

The only remotely relevant grounds for such an adjustment may be as non-recurring costs under Article 2.2.1.1 of the WTO *Anti-Dumping Agreement*[12]. However, this provision anticipates the inclusion of non-recurring costs to the producer/exporters costs of production, not the exclusion of such costs, as the Commissioner is proposing by way of this adjustment. Therefore, the Commission's approach is without statutory or WTO jurisprudential foundation.

Therefore, the applicant for review submits that the Parliamentary Secretary has erred in her determination of a normal value based on a "normalisation adjustment".

10.3 The Parliamentary Secretary has erred in working out an amount to be the profit on the sale of goods for subparagraph 269TAC(2)(c)(ii) under paragraph (a) of sub-regulation 45(3)

As outlined by the applicant for review in *section 10.1* (above), the Parliamentary Secretary cannot reasonably identify the actual amounts realised by the exporter, NatSteel, from the sale of the same general category of goods in the Singaporean domestic market.

Therefore, it was appropriate for the Commission in *Statement of Essential Facts No. 264*, to recommend that an amount to be the profit on the sale of goods to be determined using the methodology under paragraph (c) of sub-regulation 45(3).

The applicant for review notes the operation of sub-regulation 45(4), but disagrees with the submission of the exporter, NatSteel, that unless paragraph (b) of that sub-regulation is satisfied then the methodology under paragraph (c) of sub-regulation 45(3) cannot be applied. With respect, that interpretation is a complete misreading of the provision.

For clarity, sub-regulation 45(4) provides as follows:

> "However, **if**:
>
> "(a) the Minister uses a method of calculation under paragraph (3)(c) to work out an amount representing the profit of the exporter or producer of the goods; **and**
>
> "(b) the amount worked out exceeds the amount of profit normally realised by other exporters or producers on sales of goods of the same general category in the domestic market of the country of export;
>
> "**the Minister must disregard the amount by which the amount worked out exceeds the amount of profit normally realised by the other exporters or producers**. [emphasis added]

[12] World Trade Organisation (WTO), *Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade 1994*

This simply means that if paragraph (a) and (b) apply, then the Parliamentary Secretary must "disregard" an amount that "exceeds the amount of profit normally realised by other exporters or producers". It does not mean that the Parliamentary Secretary cannot use the methodology under paragraph (c) of sub-regulation 45(3). This interpretation is simply not available to the Parliamentary Secretary.

Applied here, the evidence suggests that there are no "other exporters or producers... of goods of the same general category" in the Singaporean domestic market, therefore the second limb of the provision is not satisfied, and therefore, the prescription, namely, disregarding the amount by which the proposed amount for profit under paragraph (c) exceeds "other exporters or producers" is not triggered. Therefore, the methodology under paragraph (c), stands to determine the amount of profit to be applied.

10.4 The Parliamentary Secretary has erred in her calculation of the amount to be the profit on the sale of goods by Wei Chih Steel Industrial Co., Ltd (Wei Chih) in the Taiwanese domestic market.

The applicant for review observes that the Parliamentary Secretary has erred in her calculation of the amount of delivery expenses relevant to the two domestic sales transactions upon which an amount for profit was calculated.

The applicant for review is unable to reconcile the evidence at section 10.2.2 of the Wei Chih exporter verification visit report[13] with the final quantum of the delivery cost applied, specifically that:

> *"Inland transport charges for the investigation period, when allocated overall sales, were... an insignificant adjustment and has no material effect on the dumping margin calculation",*

and yet, the reduction in profit by the delivery charges on two domestic sales of like goods resulted in a reduction of the dumping margin for Wei Chih from 4.7% (at the time of making *Statement of Essential Facts No. 264*), down to 2.8% in *Report No. 264*. Accordingly, it appears to the applicant for review that either inaccurate, unreliable, irrelevant or incomplete information has been taken into account by the Commissioner in making his recommendation to the Parliamentary Secretary in *Report No. 264*.

10.5 The Parliamentary Secretary has failed or refused to make necessary adjustments to the normal value determined for Wei Chih under subsection 269TAC(9).

In its submission to the Commission dated 21 August 2015[14], the applicant for review provided the Commission with evidence of the price premium for higher strength like goods[15] sold into the Taiwanese domestic market.[16]

---

[13] EPR Folio No. 264/061 at p. 28.
[14] EPR Folio No. 264/070.

In *Report No. 264*, the Commission neglected or refused to make an upward adjustment to the normal value by the amount of the price premium.

The WTO *Disputes Settlement Panel* in *US — Softwood Lumber V* considered that there is no requirement to adjust for any and all differences but rather only those differences demonstrated to have affected the price comparability.[17]

In its original application[18], the applicant for review provided the Commissioner with a confidential market research report evidencing price premiums of [redacted] exist in Taiwan for Grade SD 490 (the grade that most closely compares with Grade 500N exported to Australia) when compared to Grade SD 420 (the grade commonly sold in Taiwan). Indeed, the exporter, Wei Chih, admitted to the potential for price premiums/variability between different grades of like goods.[19]

Further, in its application[20] and exporter briefing to the Commission[21], the applicant for review provided the Commissioner with evidence of additional physical differences between the like goods produced by the exporter, Wei Chih, and sold into the domestic Taiwanese market, and the goods under consideration exported to Australia. Specifically, that the exporter, Wei Chih, exported to Australia, rebar micro alloyed with either niobium or vanadium, which adds [redacted] to the cost of production (subject to alloy pricing). On the other hand, the exporter produced like goods through the cheaper production process of water-quenching the steel. Indeed, in the relevant exporter visit verification report for Wei Chih, the Commission acknowledged the use of micro-alloying:

> *"We noted from the inventory ledger that Wei Chih uses vanadium and niobium alloy"*[22]

In *Report No. 264*, the Commissioner failed or refused to make an upward adjustment to the normal value for the physical differences between the goods under consideration exported to Australia and the like goods sold into the Taiwanese domestic market.

In breach of its obligation under subsection 269TAC(9) and WTO jurisprudence, the Commissioner failed or refused to take the price premium into account to the extent that it affected price comparability between the like goods sold on the domestic market and the goods under consideration exported to Australia. Further, in breach of subsection 269TAC(9), the Commissioner has failed or refused to make the necessary upward adjustment to the normal value to allow for the necessary physical comparability between the like goods and the goods under consideration.

---

[15] Identified as Grade SD 490.
[16] Op cit., at p. 3.
[17] UNITED STATES – FINAL DUMPING DETERMINATION ON SOFTWOOD LUMBER FROM CANADA (WT/DS264) WT/DS264/R (13 April 2004), para. 7.165
[18] EPR Folio No. 264/001.
[19] EPR Folio No. 264/070 at p. 21.
[20] EPR Folio No. 264/001.
[21] EPR Folio No. 264/043, at pp. 10 – 11.
[22] EPR Folio No. 264/061, at p. 19.

11 Identify what, in the applicant's opinion, the correct or preferable decision (or decisions) ought to be, resulting from the grounds raised in response to question 10.

The Parliamentary Secretary:

11.1 ought not to be satisfied that the exporter, NatSteel's costs of production or manufacture of the goods in Singapore are reliable;

11.2 ought not use the records of the exporter, NatSteel, to work out the amount of cost of production or manufacture of the goods in Singapore by using the information set out in the records;

11.3 ought to be satisfied that sufficient information has not been furnished or is not available to enable the normal value of goods to be ascertained under subsection 269TAC(2)(c);

11.4 ought to determine, the normal value of like goods by having regard to all relevant information pursuant to subsection 269TAC(6), which includes the information contained in the original application for the publication of a dumping duty notice[23];

11.5 ought not to adjust her determination of the normal value amount for NatSteel by the claimed "normalisation adjustment";

11.6 ought to work out any amount to be the profit on the sale of goods by NatSteel for the purpose of determining the normal value under paragraph (c) of sub-regulation 45(3);

11.7 ought not to calculate the amount to be the profit on the sale of goods by Wei Chih in the Taiwanese domestic market less the claimed delivery costs; and

11.8 ought to make an upward adjustment to the normal value determined for Wei Chih in relation to Taiwanese domestic sales of Grade SD 490 rebar, and for the higher costs of production of the goods under consideration exported to Australia by use of the micro-alloying production process.

[23] EPR Folio No. 264/001.

12 Set out the reasons why the proposed decision provided in response to question 11 is materially different from the reviewable decision.

Do not answer question 12 if this application is in relation to a reviewable decision made under subsection 269TL(1) of the Customs Act 1901.

The proposed decisions outlined in response to question 11, above, will materially alter the dumping margins for the named exporters, NatSteel and Wei Chih, and will materially alter the residual exporter country dumping margin rates for Singapore and Taiwan. In turn this will alter the dumping duty rates contained within the published *Dumping Duty Notice*.

To demonstrate the materiality of the changes, the applicant for review, has identified the impacts of the proposed decisions. For example, where it is proposed that the Parliamentary Secretary:

12.1 ought not to be satisfied that the exporter, NatSteel's costs of production or manufacture of the goods in Singapore are reliable;

This will materially change the amount of the normal value, and will affect the dumping margin rates. If accepted, it will have the effect of calculating the normal value according to information other than the exporter's costs of production and manufacture.

12.2 ought not use the records of the exporter, NatSteel, to work out the amount of cost of production or manufacture of the goods in Singapore by using the information set out in the records;

This will materially change the amount of the normal value, and will affect the dumping margin rates. If accepted, it will have the effect of calculating the normal value according to information other than the exporter's costs of production and manufacture.

12.3 ought to be satisfied that sufficient information has not been furnished or is not available to enable the normal value of goods to be ascertained under subsection 269TAC(2)(c);

This will materially change the amount of the normal value, and will affect the dumping margin rates. If accepted, it will have the effect of calculating the normal value according to information other than the exporter's costs of production and manufacture.

12.4 ought to determine, the normal value of like goods by having regard to all relevant information pursuant to subsection 269TAC(6), which includes the information contained in the original application for the publication of a dumping duty notice[24];

[24] EPR Folio No. 264/001.

This will materially change the amount of the normal value, and will affect the dumping margin rates. If accepted, it will have the effect of calculating the normal value according to information other than the exporter's costs of production and manufacture.

12.5 ought not to adjust her determination of the normal value amount for NatSteel by the claimed "normalisation adjustment";

This will materially change the amount of the normal value, and will affect the dumping margin rates.

12.6 ought to work out any amount to be the profit on the sale of goods by NatSteel for the purpose of determining the normal value under paragraph (c) of sub-regulation 45(3);

Assuming that this is the only proposed decision that is accepted on review, then the quantum of this change will be a 3.6% increase in the dumping margin rate for NatSteel and the residual country rate for Singapore. The materiality of this change is based on the impact it had on the dumping margin rates between the making of Statement of Essential Facts No. 264 and Report No. 264.

12.7 ought not to calculate the amount to be the profit on the sale of goods by Wei Chih in the Taiwanese domestic market less the claimed delivery costs;

Assuming that this is the only proposed decision that is accepted on review, then the quantum of this change will be a 2.7% increase in the dumping margin rate for Wei Chih and the residual country rate for Taiwan. The materiality of this change is based on the impact it had on the dumping margin rates between the making of Statement of Essential Facts No. 264 and Report No. 264.

12.8 ought to make an upward adjustment to the normal value determined for Wei Chih in relation to Taiwanese domestic sales of Grade SD 490 rebar, and for the higher costs of production of the goods under consideration exported to Australia by use of the micro-alloying production process.

Based on the confidential market research report referred to in the original application, this will result in an upward adjustment to the normal value calculation for Wei Chih of [redacted], and a further upward adjustment to the normal value of between [redacted]. In turn this will increase the dumping margin rate for Wei Chih, and the residual country rate for Taiwan by not less than [redacted].

PART D: DECLARATION

The applicant/the applicant's authorised representative *[delete inapplicable]* declares that:

- The applicant has paid the application fee and attached a copy of proof of payment to this application;
- The applicant understands that the Panel may hold conferences in relation to this application, either before or during the conduct of a review. The applicant understands that if the Panel decides to hold a conference *before* it gives public notice of its intention to conduct a review, and the applicant (or the applicant's representative) does not attend the conference without reasonable excuse, this application may be rejected;
- The information and documents provided in this application are true and correct. The applicant understands that providing false or misleading information or documents to the ADRP is an offence under the *Customs Act 1901* and *Criminal Code Act 1995*.

Signature:.....

Name: [redacted]

Position: [redacted]

Organisation: OneSteel Manufacturing Pty Ltd

Date: 18 December 2015

PART E: AUTHORISED REPRESENTATIVE

This section must only be completed if you answered yes to question 4.

Provide details of the applicant's authorised representative

Full name of representative:

Organisation:

Address:

Email address:

Telephone number:

Representative's authority to act

A separate letter of authority may be attached in lieu of the applicant signing this section

The person named above is authorised to act as the applicant's representative in relation to this application and any review that may be conducted as a result of this application.

Signature:.....
(Applicant's authorised officer)

Name:

Position:

Organisation

Date: / /