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Ms Jaclyne Fisher
Panel Member
Anti-Dumping Review Panel

Non-Confidential

Dear Ms. Fisher,

Review of Certain Decisions Regarding the Minister's Decision to Impose Anti-Dumping Measures on Steel Pallet Racking exported from China and Malaysia

I refer to your notice published on 28 June 2019 of the Review Panel's intention to conduct a review of certain decisions made by the Minister in imposing antidumping measures on steel pallet racking exported from China and Malaysia and inviting interested parties to make submissions within 30 days of the date of your notice.

One Stop Pallet Racking Pty Limited obviously is an interested party and an applicant for the review. It makes the additional submissions set out below in support of its previous submissions

One Stop Pallet Racking draws the Review Panel's attention to Section 7 of the Anti-Dumping Commission's report to the Minister and, in particular, to the graphs in that section of the report.

It is evident from those graphs that the performance of Demitac and APC are dramatically different. The question is why APC was able to maintain its sales revenues (Figure 7) but Dematic's sales revenues plummeted (Figure 6). The Review Panel should have regard to the graphs and figures in Section 7 of the Anti-Dumping Commission's Report to the Minister and why the performance of Dematic and APC are significantly different. What are the reasons for these reasons in the difference in performance? This was not addressed by the Anti-Dumping Commission in its report to the Minister but it would seem fundamental to any injury analysis.

It is clearly apparent that Dematic's loss of its business to Masters and distributors of pallet stacking systems in Australia who purchased redundant such near new systems from Masters and supplied them into the Australian discounts would impact adversely on Dematic. This no doubt would be reflected in Dematic's accounts and would have been verified by the Commission's verification team.

This has nothing to do with dumping but changes in the market for steel pallet racking systems in the Australian market and its impact on Dematic. Further, as previously submitted the description of "like goods" in the Australian industry's application for the imposition of antidumping measures is to goods that do not exist and do not refer to steel pallet racking systems imported by One Steel Pallet Racking. The

Australian industry's application is at best misguided and the Anti-Dumping Commission should have identified this. Why did it not do so?

If you have any questions or would like to discuss, happy to do so.

Kind regards

A handwritten signature in black ink, appearing to read 'Andrew Percival', with a large, stylized initial 'A' at the start.

Andrew Percival

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