

Director Operations 1
International trade Remedies Branch
Australian Customs and border Protection Service
Customs House
5 Constitution Avenue
Canberra ACT 2601

June 1st 2012

PUBLIC FILE 65

Lodgement of Submission

RE: - Australia Customs Dumping Notice No. 2012/14 Polyvinyl Chloride Homopolymer resin (PVC) exported from the Republic of Korea. Initiation of an investigation into alleged dumping.

Armstrong World Industries (Australia) Pty Ltd
23 – 39 Mills Road Bresside 3195 (Sheet Flooring Plant)
202 Settlement Road, Thomastown 3074 (Tile and Accessories Flooring Plant)

Armstrong World Industries (Australia) Pty Ltd is Australia's only vinyl flooring manufacturer, and part of the Armstrong group of flooring and ceilings manufacturing companies worldwide. We service the major commercial tile, sheet and flooring accessories markets in Australia such as in Supermarkets, Hospitals, Healthcare and Age care facilities together with servicing export markets overseas.

Armstrong is a member of The Vinyl Council of Australia and The Green Building Council Australia. Our manufacturing processes are accredited to ISO 9001 & ISO 14001 ensuring environmental and sustainable manufacturing of quality vinyl flooring in Australia. To achieve this we purchase quality local and imported raw materials. As per this submission one of our vital raw materials is Polyvinyl Chloride Homopolymer Resin (PVC) from Australian Vinyls Corporation Pty Ltd..

Australian Vinyls Corporation Pty Ltd is the sole manufacturer of Polyvinyl Chloride Homopolymer Resin (PVC) in Australia. Australian Vinyls has worked closely with The Vinyl Council of Australia and with the Green Building Council of Australia with the success of having PVC suspension and emulsion being recognized as important to the building and construction applications. PVC is part of the criteria developed by the technical committee advising the Green Building Council Australia to ensure that PVC complements the objective of the Green Buildings and adds to the Green Star Rating sought by manufacturers such as vinyl flooring products.

So our local PVC manufacturer and imported PVC must meet the environmental guidelines if they are to supply to the Green Building Council Australia criteria. Our only local manufacturer of PVC Australian Vinyls has been recognized as the only producer locally to audited and certified to meet these criteria. To our knowledge worldwide there are no other manufacturers of Polyvinyl Chloride Homopolymer Resin (PVC) that have been recognized to meet these criteria.

As a customer of Australian Vinyls to gain the Green Star Rating we can only use their Corvic PVC Resin which could and believe has attracted a premium. And if no other producer of PVC worldwide is prepared to invest in the time and effort to comply, could lead to major implications were manufactures would encourage production of their products offshore.

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FLOORING

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Armstrong USA is currently investing in two sheet flooring plants in Shanghai China. This could affect the flooring manufacturing in Australia if barriers keep on being placed on imports of required vital raw materials such as PVC. We at Armstrong Australia are currently testing PVC products from LG Chemicals manufactured in Korea which comply with these criteria of best practice PVC as set by The Green Building Council Australia plus LG Chemicals are in the final process of finalizing their verification.

In 2008 Australian Vinyls due to unforeseen circumstances in their manufacturing process were unable to supply the Australian market with PVC products for a number of months. This seriously affected the manufacturing processes, of many Australian converters of PVC. Including Armstrong World Industries (Australia) Pty Ltd. We were one of the fortunate manufacturers that didn't put all of their supply chain of PVC from one source. We have specific manufacturing processes that require specific properties in the PVC grades we use, some of which Australian Vinyls don't manufacture and no longer import from Formosa Plastics to complement their range of PVC products. Basically Formosa does not meet the criteria of The Green Building Council Australia. Based on specific requirements of our manufacturing processes in Australia, we at Armstrong World Industries (Australia) Pty Ltd need to import from other manufacturers of PVC to keep operations in Australia. Whether from China, Thailand, Taiwan, Korea, Malaysia, Europe, USA, or South America which meet our manufacturing needs and the criteria of The Green Building Council Australia best practice PVC.

Regards

Robert Contarin

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Armstrong World Industries (Australia) Pty Ltd

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