

APPLICATION
FOR
CONTINUATION OF DUMPING DUTY NOTICES

**PINEAPPLE FRUIT – CONSUMER & FOOD SERVICE
INDUSTRY (FSI)**

exported from

THE PHILIPPINES and THAILAND

Public File

1. Provide details of the name, street and postal address, of the applicant seeking the continuation.

The applicant seeking the continuation (or extension) of anti-dumping measures applicable to Pineapple Fruit – Consumer and Food Service Industrial (“FSI”) exported from the Kingdom of Thailand (“Thailand”) and the Republic of the Philippines (“Philippines”) is Golden Circle Limited (“GCL”) (ABN 85 054 355 618). GCL is a wholly owned subsidiary company of H.J. Heinz Company Australia Limited (ABN 87 004 200 319).

GCL’s address and contact details are as follows:

Golden Circle Limited
260 Earnshaw Road
Northgate Queensland 4013

Tel: (07) 3266 0000

2. Provide details of the name of the contact person, including their position, telephone number and facsimile number, and email address.

The contact details of personnel at H J Heinz to assist with this application on behalf of GCL are as follows:

(i) Ms Carolyn Fox
General Counsel – APAC
H J Heinz Company Australia Limited
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Email: carolyn.fox@kraftheinzcompany.com

(ii) Mr Leonard Hickey
Legal Counsel – ANP
H J Heinz Company Australia Limited
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This application for the continuation of anti-dumping measures on pineapple consumer and FSI exported from Thailand and the Philippines has been prepared with the assistance of:

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3. Provide the names, addresses, telephone numbers of other parties likely to have an interest in this matter.

GCL is the sole Australian manufacturer of processed pineapple in Australia. GCL therefore constitutes the Australian industry for the purposes of this application.

Other interested parties (i.e. exporters) to this application include as follows:

The Philippines

(i) Dole Pineapple Company
26th Floor Tower 2
Insular Life Corporate Centre
Filinvest Corporate City, Alabang

1781 Muntinlupa City, Philippines
Tel: +632 771 2146
Fax: +632 771 2146

- (ii) Del Monte Philippines
c/o Del Monte Pacific
c/p 17 Bukit Road
Singapore 089831
Tel: +65 6324 6822
Fax: +65 6221 9477

Thailand

- (i) Siam-Agro Food Industry Public Co., Ltd
50 GMM Grammy Place 17th Floor
Sukhumvit 21 (asoke) Road
Klongtoey Nua, Wattana
Bangkok 10110 Thailand
Tel: +66 0 2665 9333
Fax: +66 0 2665 9348
- (ii) TIPCO Foods Public Company Limited
Floor 28-29, Tipco Tower
118/1 Rama 6 Road
Samsennai Phayathai, Bangkok 10400 Thailand
Tel: +66 2273 6200
Fax: +66 2271 4304
- (iii) Kuiburi Fruit Canning Co Ltd
Muang Kaew Building
236 Sirindhorn Road
Bangplad Bangkok 10700 Thailand
Tel: +662 8810 530-5
Fax: +662 435 0956
- (iv) Prime Products Industry Co., Ltd
79/1 Moo 4, Kasetsuwan, Bo-tong
Chonburi 20270 Thailand
Tel: +66 38165 430
Fax: +66 38165 429

4. Provide details of the current anti-dumping measures the subject of this continuation application, including:

- Tariff classification;
- The countries or companies specified;
- Date of publication of the measure.

The goods covered by the anti-dumping measures are pineapple fruit – consumer, and pineapple fruit – food service industry (“FSI”) exported from the Philippines and Thailand (except for pineapple fruit – FSI exported by Malee Sampran Public Co and pineapple fruit – consumer exported by Thai Pineapple Canning Industry Corp Ltd).

The goods subject to measures (the goods) are:

- pineapple prepared or preserved in containers not exceeding one litre (consumer pineapple); and
- pineapple prepared or preserved in containers exceeding one litre (food service and industrial i.e. FSI).

The goods are classified to the following tariff classifications in Schedule 3 to the *Customs Tariff Act 1995*:

Tariff Sub-heading/stat code	Description
2008.20.00/26	Canned, in containers not exceeding one litre
2008.20.00/27	Canned, in containers exceeding one litre
2008.20.00/28	Other

The goods imported from the Philippines and Thailand attract a “Free” rate of duty.

The anti-dumping measures on pineapple fruit – consumer exported from Thailand (except by Thai Pineapple Canning Industry Corp Ltd) are due to expire on 14 October 2016. The anti-dumping measures were continued for a further five years from 14 October 2011 by the then Minister for Home Affairs following consideration of Trade Measures Report No. 171d.

The anti-dumping measures on pineapple fruit – FSI exported from Thailand (except by Malee Sampran Public Co) are due to expire on 14 October 2016. The anti-dumping measures were continued for a further five years from 14 October 2011 by the then Minister for Home Affairs following consideration of Trade Measures Report No. 171c.

The anti-dumping measures on pineapple fruit – consumer exported from the Philippines are due to expire on 29 September 2016. The anti-dumping measures were continued for a further five years from 29 September 2011 by the then Minister for Home Affairs following consideration of Trade Measures Report No. 171b.

The anti-dumping measures on pineapple fruit – FSI exported from the Philippines are due to expire on 29 September 2016. The anti-dumping measures were continued for a further five years from 29 September 2011 by the then Minister for Home Affairs following consideration of Trade Measures Report No. 171a.

- 5 **Provide a detailed statement setting out the reasons for seeking the continuation of the anti-dumping measures. An application must establish reasonable grounds for asserting that the expiration of the anti-dumping measure(s) might lead, or be likely to lead, to the recurrence of the material injury that the measure(s) are intended to prevent.**

(i) The Goods – consumer and FSI pineapple

As indicated above, the goods the subject of this application are pineapple fruit – consumer and pineapple fruit – FSI.

(ii) Application coverage

The coverage of the measures for pineapple fruit – consumer extends to all exporters in the Philippines and Thailand (except for Thai Pineapple Canning Co., Ltd of Thailand).

The coverage of the measures for pineapple fruit – FSI extends to all exporters in the Philippines and Thailand (except for Malee Sampran Public Co., Ltd of Thailand).

Part A – Will the dumping continue or recur?

(iii) Anti-dumping actions by other countries

It is GCL’s understanding that the goods are not the subject of anti-dumping measures by other countries (measures on canned pineapple exported from Thailand were revoked in 2007).

(iv) Relevant evidence as to the current normal values for pineapple fruit – consumer and FSI in the Philippines and Thailand

The Philippines

GCL has relied upon [source] to obtain domestic selling prices for pineapple fruit sold in the Philippines. The prices are at the retail level. [Source] has been advised that the ex-works price can be calculated from the retail price by deducting from the retail price a ■ per cent retailer margin (the standard commercial practice in the Philippines), and a further ■ per cent trade deal/wholesale discount.

Domestic prices for pineapple fruit – consumer sold in the Philippines (at retail level) were as follows:

Table 1- Domestic selling prices for pineapple fruit (consumer) in Philippines

Type	Brand	Pack Size	Price (PHP)
Chunks	Del Monte	227g	■
	Del Monte	836g	■
	Dole	200g	■
	Dole	560g	■
Tidbits	Del Monte	115g	■
	Del Monte	200g	■
	Dole	115g	■
	Dole	567g	■
Slices	Del Monte	234g	■
	Del Monte	836g	■
	Dole	227g	■

Source: [Organisation], January 2016 (refer Confidential Attachment 1).

GCL has been unable to obtain domestic selling prices for FSI equivalent pineapple fruit (i.e. can sizes greater than one litre) in the Philippines. In the absence of information on domestic prices for FSI pineapple fruit in the Philippines, it is considered that the domestic selling prices for the large consumer can (i.e. 836g) can be used for comparison with FSI export prices for the Philippines.

Thailand

Domestic sales of pineapple fruit in cans are limited in Thailand. This is due to the vast majority of pineapple sold in Thailand being fresh pineapple. It is possible (as in earlier inquiries) that there may be an absence of domestic sales in sufficient volumes by an exporter for normal values to be determined.

GCL has again relied upon [source] to obtain domestic selling prices for pineapple fruit sold in Thailand. The domestic prices obtained are at the retail level.

Table 2 – Domestic selling prices for pineapple fruit (consumer) in Thailand

Type	Brand	Pack Size	Price (Thai Baht)
Pineapple in light syrup	Dole	227g	■
Pineapple slices in heavy syrup	Brook	567g	■

Source: [Organisation], January 2016 (refer Confidential Attachment 2)

GCL has been unable to obtain domestic selling prices for FSI equivalent pineapple fruit (i.e. can sized greater than one litre) sold in Thailand. In the absence of information on domestic selling for FSI pineapple fruit in Thailand, GCL has relied upon the selling prices for the largest consumer pack (i.e. 576g can) to estimate domestic selling prices for FSI fruit sold in Thailand.

(v) Have exports continued following the imposition of measures and estimates of export prices

Exports of pineapple fruit – consumer and FSI have continued in substantial volumes from the Philippines and Thailand since the measures were continued in 2011.

GCL has obtained Australian Bureau of Statistics (“ABS”) import data for consumer and FSI pineapple. Imported pineapple fruit is classified as follows:

Tariff Sub-heading/stat code	Description
2008.20.00/26	Canned, in containers not exceeding one litre
2008.20.00/27	Canned, in containers exceeding one litre
2008.20.00/28	Other

Import data for 2013 to 2015 obtained from the ABS is disclosed in the following Tables.

Table 5 – Imports of pineapple fruit – consumer - 2008.20.00/26

Country	2013 (Tonnes)	2014 (Tonnes)	2015 (Tonnes)	2015 % of total
China	98,400	108,712	63,069	0.99%
Indonesia	949,890	344,986	52,415	0.83%
Philippines	1,927,398	3,081,807	4,387,633	69.10%
Thailand	2,090,540	3,375,013	1,830,634	28.83%
Vietnam	72,732	19,764	10,271	0.16%
Other	7354	12,415	5,278	0.09%
Total	5,146,314	6,942,697	6,349,300	100%

Source: ABS (Refer Confidential Attachment 3).

Imports of pineapple fruit - consumer have continued from the Philippines and Thailand following the continuation of measures in 2011. Both countries remain the two largest supply sources for imported pineapple fruit – consumer, accounting for 69.1 per cent (the Philippines) and 28.83 per cent (Thailand) of total imports in 2015.

Table 6 – Imports of pineapple fruit – Food Service Industry (FSI) - 2008.20.00/27

Country	2013 (Tonnes)	2014 (Tonnes)	2015 (Tonnes)	2015 % of total
China	365,863	55,102	89,213	0.61%
Indonesia	5,012,863	4,489,532	2,975,270	20.35%
Philippines	2,250,649	1,535,344	341,933	2.34%
Thailand	6,079,242	6,025,553	10,402,410	71.14%
Vietnam	381,560	302,329	676,298	4.62%
Other	18,931	54,423	138,138	0.94%
Total	14,109,108	12,462,283	14,623,262	100%

Source: ABS (Refer Confidential Attachment 3).

The import data confirms that exports of pineapple fruit – FSI from the Philippines and Thailand have continued following the continuation of measures in 2011. Thailand remains the largest source of imported pineapple fruit – FSI in 2015 (71.14%), with the Philippines accounting for 2.34 per cent of total imports. It should be noted that the Philippines accounted for far greater shares in 2013 and 2014, with 15.95 per cent and 12.32 per cent, respectively.

Table 7 – Imports of pineapple fruit – Other - 2008.20.00/28

Country	2013 (Tonnes)	2014 (Tonnes)	2015 (Tonnes)	2015 % of total
China		5,385	144	0.02%
Indonesia	36,000	201,271	407,183	44.87%
Philippines	24,137	-	-	
Thailand	671,844	483,640	485,514	53.42%
Vietnam	320	-	-	
Other	10,244	22,704	15,458	1.70%
Total	742,545	713,000	908,929	100%

Source: ABS (Refer Confidential Attachment 3).

Imports of pineapple fruit in containers or packaging (not canned) have continued in 2015. It is understood that the imports in this category are likely to be pineapple fruit in plastic cups of plastic packaging. Thailand remains the largest source of pineapple fruit in this category.

The 2015 ABS import data confirms that imports of pineapple fruit – consumer and FSI from the Philippines and Thailand have continued since measures were continued in 2011.

(vi) Have exporters in the Philippines and Thailand maintained distribution links in Australia?

The ABS import data supports a view that exporters in the Philippines and Thailand have maintained distribution links in Australia and continue to supply the market in Australia during 2015 via those well-established distribution links.

The continued supply into Australia by exporters in the Philippines and Thailand in volumes that are significant also confirms that the exporters have ongoing commercial agreements to supply in place with Australian customers.

(vii) Do producers/exporters of pineapple fruit – consumer and FSI – in the Philippines and Thailand retain excess capacity that may be directed to Australia?

Supply of processed pineapples by exporters in the Philippines and Thailand is driven by the availability of fresh pineapples in the respective countries. The attached Food News article (refer Non-Confidential Attachment 4) confirms that exports of pineapple fruit from the Philippines has increased during 2015, indicating increased capacity to supply at reduced costs when contrasted with rival producing countries (i.e. Thailand).

A further article from ‘Asian Correspondent¹’ confirms that the Central Mindanao region of the Philippines (where Dole Philippines Inc., is located) has increased exports of canned pineapple to 14.6 million tonnes in the period (Jan to Aug) which was ahead of the volumes to the same time for the previous year (totaling 27.4 million tonnes in 2014).

Thailand is the world’s leading producer of pineapples, ahead of the Philippines (ranked second). However, unlike in the Philippines, 95 per cent of pineapple is grown on small, privately owned farms

¹ Refer Non-Confidential Attachment 5.

ranging from 1-5 hectares in size. These small growers supply fresh pineapples to processors. In the Philippines, the multinational companies dominate production.

Processors in both the Philippines and Thailand are well positioned to supply pineapple fruit in increased volumes should the measures be allowed to expire. This is particularly the case given the increase in exports from emerging suppliers in Indonesia and Vietnam.

(viii) Will future exports of pineapple fruit – consumer and FSI – from the Philippines and Thailand be at dumped prices?

GCL has contrasted obtained domestic retail prices in the Philippines and Thailand with weighted-average export prices (ex ABS) for the designated categories (i.e. less than one litre, greater than one litre, and “other” (i.e. not canned pineapple).

A ■ per cent reduction of the retail price was made to account for adjustments for retailer and distribution margins.

As import prices are not further divided into can size categories, GCL has used the weighted average FOB price from ABS for comparison with the adjusted retail domestic price (for consumer pineapple fruit). Calculated dumping margins are included in Table 8 below.

Table 8 – Comparison of domestic and export prices – consumer (i.e 2008.20.00/26)

	Domestic Price (less ■ per cent) per can	Adjusted ex-factory Domestic Price A\$/kg	Weighted-Average Export Price A\$/litre	Dumping Margin A\$/litre	Per cent of Export Price
Philippines (peso)					
- 227g	■	■	■	■	■
- 836g	■	■	■	■	■
Thailand (baht)					
- 227g	■	■	■	■	■
- 567g	■	■	■	■	■

Notes:

- Domestic prices obtained by GCL in country of export – See Confidential Attachments 1 & 2. Downward adjustment of ■ per cent made to account for retailer & distributor margins in exporting country (in absence of other information).
- A\$/litre to A\$/kg i.e. (1:1 ratio).
- Rates of exchange used for Philippines (PHP 33.16:A\$1) and Thailand (Baht 25.18:A\$1) sourced from ofx.com;
- Export prices sourced from ABS. Annual figure used as no breakdown by package size available from ABS data.

For FSI pineapple, GCL has again relied upon the domestic retail selling prices (in the absence of any other available information, this is considered most reliable) obtained in the Philippines and Thailand. The domestic prices have been further adjusted (i.e. in addition to the ■ per cent discount for retail and distributor margins) by the price differential between consumer and FSI categories for the Philippines and Thailand respectively as revealed in export prices between the two statistical codes. Please refer to Table 8 below.

Table 8 – Comparison of domestic and export prices – FSI (i.e. 2008.20.00/27)

	Domestic Price (less ■ per cent)	Adjusted ex- factory Domestic Price A\$/kg	Weighted- Average Export Price A\$/litre	Dumping Margin	Per cent of Export Price
Philippines					
- 836g	■	■	■	■	■
Thailand					
- 526g	■	■	■	■	■

Notes:

1. Domestic prices obtained by GCL in country of export – See Confidential Attachments 1 & 2. Downward adjustment of ■ per cent made to account for retailer & distributor margins in exporting country (in absence of other information). Further adjustment for FSI product based upon export price differential between consumer (statistical code 26) and FSI (statistical code 27) in 2015 ABS import statistics.
2. A\$/litre to A\$/kg i.e. (1:1 ratio).
3. Rates of exchange used for Philippines (PHP 33.16:A\$1) and Thailand (Baht 25.18:A\$1) sourced from ofx.com;
4. Export prices sourced from ABS. Annual figure used as no breakdown by package size available from ABS data.

GCL has not calculated margins for imported “other” pineapple fruit. Imports are dominated by supply ex Thailand and it is understood the goods are predominantly pineapple fruit – consumer in plastic cups.

As the average export price for Thailand is higher than that declared for pineapple fruit – consumer, the calculated dumping margins will be less than those determined in Table 7.

Part B – Will material injury recur?

(ix) In the absence of measures, will future imports of pineapple fruit – consumer and FSI – from the Philippines and Thailand cause injury, or threaten to cause injury, to the Australian industry?

Extension of measures required

GCL is firmly of the view that in the event the anti-dumping measures on pineapple fruit – consumer and FSI are allowed to expire that it will experience a recurrence of material injury that the measures are intended to prevent.

Local raw material purchases

GCL is the sole manufacturer of processed pineapple at its Northgate production facility. In 2016, GCL is forecasting that it will purchase approximately xxxxxx metric tonnes of pineapple fruit from local pineapple growers in Australia for processing as pineapple fruit for supply into the consumer and FSI segments of the Australian market. The purchase cost of the fresh pineapples is estimated at \$■ million, providing ongoing support to local growers.

GCL Capital expenditure in 2015

In 2015, GCL has undertaken a number of capital improvements to the Northgate facility. The cost of the capital improvements in 2015 were \$■ million, demonstrating an ongoing commitment by GCL to continue processing pineapple fruit at Northgate (refer Confidential Attachment 6 for a breakdown of 2015 capital expenditure at Northgate).

Import competition

The Australian market for pineapple fruit – consumer and FSI remains a viable market for a local supplier like GCL. The company processes and sells the majority of its pineapple fruit in the

consumer segment of the market, with further significant volumes into the FSI segment. GCL encounters strong competition from imports at its key retail customers including Coles, Woolworths, Aldi, IGA, etc. GCL also supplies into the FSI market segment including to customers such as [companies], pizza outlets, restaurants, etc. It is difficult for GCL to obtain evidence of import offers for imported pineapple fruit as negotiations typically operate on a tender (or similar) basis, with the customer limiting information provided to GCL to either a success or failure outcome.

The ongoing import volumes from the Philippines and Thailand confirm that customers in both the consumer and FSI market segments are continuing to source imported pineapple fruit from both countries at prices that undercut the Australian industry. GCL has obtained copies of recent negotiations with two customers in the FSI segment, demonstrating GCL was unsuccessful at both FSI accounts due the alternate supply being significantly lower (in one instance, by approximately 40 per cent).

Thailand and the Philippines are the two largest pineapple fruit processing countries globally. Anti-dumping measures have been in force against suppliers in Thailand since 2001, and against exporters in the Philippines since 2006. The measures have enabled GCL to continue processing pineapple fruit at its Northgate site and selling canned pineapple under its own label, and select private label brands (for certain customers), and ensuring that injurious dumping is limited. The removal of the full injurious impact of dumping is not always possible with measures becoming outdated with changes in selling prices on overseas markets and local costs. However, GCL is seeking to maintain contemporaneous measures in the event the measures are extended for a further five-year period.

Impact of removal of measures

GCL does not consider that the findings contained in earlier pineapple fruit – consumer continuation inquiries on imports from Thailand (Report No. 171d) and the Philippines (Report No. 171b) are any different in 2016 to what they were in 2011.

GCL's locally processed pineapple fruit competes directly with imported generic labeled pineapple fruit from the Philippines and Thailand. In the absence of anti-dumping measures it is likely that retailers' shelf prices of pineapple fruit - consumer would be lower than they otherwise would be, given that dumping margins exist on the exported goods. GCL's domestic selling prices are depressed and suppressed as a consequence of the dumped prices, and this is reflected in the profit and profitability of the business as shown in the financial appendices (i.e. CTM&S for , <1 litre, and > 1 litre).

GCL also maintains that the then Customs and Border Protection's findings that there exists a *"strong relationship between the purchase price of imported consumer pineapple and the retail prices of generic and branded pineapple and considered there is sufficient evidence to consider that retail prices for standard generic consumer pineapple were lower than what they would have otherwise been had the goods not been exported at significantly dumped prices²"* continues to apply as at the date of this application, and applies equally to exports sourced from the Philippines and Thailand.

GCL has experienced a loss of sales volumes from 2013 to 2015, along with increasing costs to process pineapple fruit – consumer. The price undercutting from imported (and dumped) consumer pineapple from the Philippines and Thailand has impacted GCL's profit and profitability, resulting in a deterioration since 2013 (refer Confidential Financial Appendices for < 1 litre).

It is evident that the anti-dumping measures require a review to contemporary levels to ensure that dumping does not further contribute to reduced profits and profitability in GCL's pineapple fruit – consumer business.

In respect of pineapple fruit – FSI, GCL has lost sales since 2013 and has experienced cost increases that it has not been able to recover in its selling prices into this market segment. An inability to increase selling prices in the FSI segment can be attributed to the availability of dumped imports, principally from the Philippines and Thailand (refer Table 6b above).

² Refer Trade Measures Report No. 171d at P. 15.

GCL submits that should the anti-dumping measures on pineapple fruit – consumer and FSI, be allowed to expire on exporters from the Philippines and Thailand, it is likely that the Australian industry producing processed pineapple fruit – consumer and FSI will experience further material injury from dumping. GCL is seeking the Parliamentary Secretary to extend the anti-dumping measures for a further five-year period (and not allow the measures to expire).

Part C - Conclusions

(x) Conclusions on dumping and material injury in the absence of measures on pineapple fruit – consumer and FSI – exported from the Philippines and Thailand.

GCL submits that should the anti-dumping measures on pineapple fruit – consumer and FSI be allowed to expire, it is likely that the Australian industry (as represented by GCL) will experience a recurrence of material injury that the measures are intended to prevent.

GCL's contention is based upon the following considerations:

- import volumes of pineapple fruit – consumer and FSI have continued since the measures were continued in 2011, and hold large proportions of the total import volume into Australia in 2015;
- exporters of pineapple fruit – consumer and FSI in the Philippines and Thailand have maintained distribution links in Australia, as evidenced by the ongoing volumes exported to Australia in 2015;
- on a *prima facie* basis, it appears that pineapple fruit – consumer and FSI has been exported from the Philippines and Thailand at dumped prices in 2015;
- GCL's CTM&S data (as reflected in appendices < 1 litre (consumer), and > 1 litre (FSI), confirm that it has experienced increases in costs that have not been recovered in higher selling prices in 2015, and is therefore susceptible to further material injury from dumping;
- processors in the Philippines have continued to grow exports in 2015 and the removal of measures would provide an opportunity for exporters to further increase export volumes to Australia;
- exporters in Thailand (the largest pineapple processing country in the world) would, in the absence of measures, seek to increase export volumes to Australia;
- recent capital expenditure on GCL's Northgate processing operations demonstrates a commitment by GCL to ongoing local processing, although returns in 2015 have not enabled GCL to benefit from the recent expenditures; and
- the Australian industry is experiencing price undercutting from imported pineapple fruit – consumer and FSI from the Philippines and Thailand that causes selling prices for locally produced processed pineapple fruit – consumer and FSI, to be lower than they otherwise would be.

This application demonstrates that should the anti-dumping measures on pineapple fruit – consumer and FSI be allowed to expire, it is likely that the Australian industry manufacturing like goods would experience a recurrence of material injury.

GCL requests the Commissioner to conduct a formal investigation into the continuation of anti-dumping measures on pineapple fruit – consumer and FSI exported from the Philippines and Thailand in accordance with the provisions contained in Division 6A – Continuation of anti-dumping measures within the Customs Act.

List of Attachments

Attachment No	Description	Confidential/Non-Confidential
1	Domestic Selling Prices – the Philippines	Confidential
2	Domestic Selling Prices – Thailand	Confidential
3	ABS Import Data & Summaries	Confidential
4	Food News Article, 8 December 2015	Non-Confidential
5	Asian Correspondent Article, 30 November 2015	Non-Confidential
6	GCL Capital Expenditures, Northgate 2015	Confidential
7	Import Competition Example	Confidential
8	Import Competition Example	Confidential
	Financial Data – Appendices A3, A6 (less than 1 litre (consumer) and > 1 litre (FSI)).	Confidential
	Authority to Represent	Confidential