Australian Government

Australian Customs and Border Protection Service

INTERNATIONAL TRADE REMEDIES BRANCH

CONSIDERATION REPORT NO. 192

APPLICATION FOR THE REVIEW OF ANTI-DUMPING MEASURES

PROCESSED DRIED CURRANTS

EXPORTED FROM GREECE

15 October 2012

1 Summary and recommendations

This consideration report is in response to an application by Frutex Australia Pty Ltd (Frutex) for the review of anti-dumping measures that apply to processed dried currants (currants) exported to Australia from Greece. Frutex is an importer of currants from Greece and has applied for a review of all of the variable factors (normal value, export prices and non-injurious price) relating to the Greek exporter, Agricultural Co-op Union Aeghion (Aeghion).

Frutex has also applied for the measures as they relate to Aeghion to be revoked because they are no longer warranted.

This report provides the results of the consideration by the Australian Customs and Border Protection Service (Customs and Border Protection) to the Chief Executive Officer of Customs and Border Protection (CEO) as to whether or not to reject the application.

1.1 Recommendations

We recommend that the delegate of the CEO decide:

1) **not to reject** the application for review of variable factors; and
2) **to reject** the application for revocation

If the delegate accepts these recommendations, to give effect to that decision, the delegate must publish a notice indicating that it is proposed to review the measures covered by the application.

1.2 Application of law to facts

Division 5 of Part XVB of the Customs Act 1901 (the Act[1]) sets out, among other things, the procedures to be followed by the CEO in dealing with an application for the review of measures.

The Division empowers the CEO to reject or not reject an application for review of anti-dumping measures. Depending on the CEO's decision, it may be necessary for the CEO to publish a notice indicating that it is proposed to review the measures covered by the application.

The CEO's powers have been delegated to certain officers of Customs and Border Protection.

1.3 Findings and conclusions

We have examined Frutex's application for a review of the anti-dumping measures applying to currants exported to Australia from Greece.

We are satisfied that the application lodged by Frutex provides the required information to initiate a review of variable factors.

[1] A reference to a division, section or subsection in this report is a reference to a provision of the Act, unless otherwise specified.

We are also satisfied, having regard to the applicant's claims and other relevant information, that there appear to be reasonable grounds for asserting that there have been changes in the variable factors.

We are satisfied, having regard to the applicant's claims and other relevant information, that there are not sufficient grounds for asserting that the measures are no longer warranted.

Our reasons for being satisfied are based on the applicant's demonstration of changes in the export price, normal value and non-injurious price are set out below, along with our reasons for finding in the negative in relation to the claims made for the revocation of the measures.

2 Background

On 24 September 2012, Frutex, an importer of currants from Greece, lodged an application requesting a review of the variable factors and the revocation of the anti-dumping measures applying to currants exported to Australia from Greece by Aeghion.

2.1 Existing measures

Anti-dumping measures were first imposed on currants from Greece on 14 January 2009 (Report 140 (REP 140) refers. The measures have not been reviewed since they were imposed.

2.2 The goods subject to the measures

The goods the subject of the application are processed dried currants of the grape variety *Vitis Vinifera L. Black Corinth*. Sultanas, muscat raisins, unprocessed currants or blended dried fruit mixtures are excluded from the investigation.

The original applicant defined the meaning of “processed” in the context of dried currants as:

> Processing of sun dried currants involves a multi-staged procedure which includes the separation of good fruit from stems, capstems, poor fruit, grit, and other foreign matter through a riddle and cone system. The fruit then passes onto a belt where it is examined and unsuitable fruit or foreign matter not removed earlier is removed via hand-picking, prior to washing of the fruit and then passing to a de-watering procedure via a spinner. Finally, a light oil is sprayed onto the fruit before packing for sale.

The applicant further clarified the description of the goods as follows:

> Dried currants are black raisins. Raisins are a dried vine fruit (i.e. predominantly seedless grapes of the variety Vitis Vinifera L.) of which there are two very distinct types (i.e. black and white raisins). Currants are black raisins that are dried under the sun and consumed predominantly as dried fruits in food and sweets or alone. Greek currants are of the variety (cultivars) Vitis Vinifera L. Black Corinth. Sub-varieties of Vitis Vinifera L. Black Corinth include Provincial, Vostizza and Gulf.
>
> Sultanas (white raisins) are grapes of a generally light colour which are dried under the sun and consumed predominantly as dried fruits in food, alone, mixed with other dried fruit or used as food additives. Greek sultanas are of the variety (cultivars) Vitis Vinifera L. Apyrena.

The goods under consideration ("GUC") do not include buck currants or red currants, nor does it include berries (e.g. red berries). The GUC also does not include a reference to the percentage content of currants as the applicants consider once a tolerance level is included, product could be tailored specifically to circumvent the description.

2.2.1 Imports

Since the last duty assessment undertaken in relation to the applicant[2], in October 2012, the applicant has continued import the goods subject to the present application from the identified exporter in Greece. Customs and Border Protection's import database indicates that the applicant imported a total of ██████ kilograms of the goods from the exporter concerned during the period 14 January to 30 August 2012.

For completeness, details of the imports for the period 10 October 2008 to 30 August 2012 are at **confidential attachment 1**.

2.3 Tariff classification of the goods

The goods are correctly classified to tariff subheading 0806.20.00, statistical code 29 in Schedule 3 of the *Customs Tariff Act 1995 (Cth)*. The rate of duty for the goods exported from Greece is 5%.

2.4 Australian industry producing like goods

The original investigation (the findings of which are resented in REP 140 attached in full at **confidential attachment 2**) found that there was an Australian industry producing like goods, comprised of three principal Australian producers of currants; Sunbeam Foods Pty Ltd (Sunbeam), Clyne Foods Pty Ltd (Clyne) and Sunraysia Dried Fruits Pty Ltd (Sunraysia). At that time, the three Australian producers sold currants on the domestic market and Sunbeam exported a small proportion of their production volume to overseas markets.

For completeness we note that REP 140 considered currants to be close processed agricultural goods pursuant to subsection 269T(4B) of the *Customs Act 1901*. Pursuant to subsection 269T(4A)[3], Customs and Border Protection considered that the Australian industry consisted not only of the Australian producers of currants, namely Sunbeam, Clyne and Sunraysia, but also, Australian dried currant growers.

Customs and Border Protection understands that Australian Dried Fruits Association (ADFA) is the peak industry representative body of dried fruit growers. In the original investigation, Customs and Border Protection found that ADFA members accounted for the majority of dried currant production in Australia.

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[2] Application number 6.

[3] Subsection 269T(4A) sets out that where the "like goods" produced by the Australian industry are close processed agricultural goods, then the Australian industry consists, not only, of those persons producing the processed goods (i.e. currants), but also, those persons producing the raw agricultural goods from which the processed goods are derived (i.e. dried currants).

Information will be sought from the principle producers of currants, and ADFA, during the review to assist in calculating an unsuppressed selling price from which a NIP will be determined.

3 Compliance with s.269ZB

3.1 Finding

We are satisfied that the application lodged by Frutex complies with the requirements of s.269ZB.

3.2 Legislative framework

Pursuant to Section 269ZA of the *Customs Act 1901*, where anti dumping measures have been imposed with respect of goods, applications that the CEO initiate a review of measures can be made by an 'affected party'[4] who considers that it may be appropriate to review those measures as they affect a particular exporter of those goods, or as they affect exporters of those goods generally, on the grounds that:

(i) one or more of the variable factors relevant to the taking of the measures in relation to that exporter or those exporters have changed; or

(ii) the anti-dumping measures are no longer warranted;

Subsection 269ZB(1) requires that the application be in writing, be in an approved form, contain such information as the form requires and be signed in the manner indicated by the form.

Subsection 269ZB(2) requires an applicant to provide:

- a description of the kind of goods to which the measures the subject of the application relate; and
- a description of the measures the subject of the application; and
- if the application is based on a change in variable factors, a statement of the opinion of the applicant concerning:
  - the variable factors relevant to the taking of the measures that have changed; and

[4] "affected party" , in relation to an application under Division 5 for review of anti-dumping measures imposed on particular goods, is defined under Section 269T of the ACT to be:

(a) a person who is directly concerned with the exportation to Australia of the goods to which the measures relate or who has been directly concerned with the exportation to Australia of like goods; or

(b) a person who is directly concerned with the importation into Australia of the goods to which the measures relate or who has been directly concerned with the importation into Australia of like goods; or

(c) a person representing, or representing a portion of, the Australian industry producing like goods; or

(d) the Government of a country from which like goods have been exported to Australia.

- the amount by which each such factor has changed; and
- the information that establishes that amount.

Subsection 269ZB(2) also provides that, if the application is based on circumstances that, in the applicant's view, indicate that the anti-dumping measures are no longer warranted the applicant must provide evidence, in accordance with the approved form, of the alleged circumstances

3.3 Particulars of the application

Frutex has submitted an application for the initiation of both a variable factors review and revocation review of measures in respect of the subject goods pursuant to Section 269ZA.

In summary, the application requests the CEO to;

i) Review the level of the measures on the basis that the specific variable factors of the normal value, export price and non-injurious price which provide the basis for the imposition of measures currently in force have changed in relation to a particular exporter of the subject goods (**a variable factors review**); and

ii) Revoke the measures on the basis that anti dumping measures are no longer warranted in relation to a particular exporter on the grounds that there is no dumping and no injury being caused to the Australian industry (**a revocation review**)

3.4 Our assessment

The application lodged by Frutex:

- was in writing;
- provided a description of the goods subject to the measures;
- provided a description of the measures the subject of the application; and
- provided statements of the factors that had changed and information to support those statements (in relation to the application for a variable factors review)[5]; and
- evidence, in the approved form, of the particular circumstances which the applicant believes indicate that the measures are no longer warranted (in relation to the application for a revocation review)[6].

On the basis of the above, we are satisfied that the application for both satisfies the form and substance requirements under section 269ZB.

[5] Specific deficiencies with the supporting information provided in relation to this aspect of the application are discussed in our assessment of the claims below.
[6] See fn (5)

4 Consideration of reasonable grounds

4.1 Finding

We are satisfied, having regard to the applicant's claims and other relevant information, that there appear to be reasonable grounds for asserting that one or more of the variable factors relevant to the taking of anti-dumping measures have changed.

However, we are not satisfied, on the basis of the supporting evidence provided by the applicant and other available information, that there are reasonable grounds for asserting that dumping measures are no longer warranted and for a revocation review to be initiated.

4.2 Variable factors review

Grounds for asserting variable factors have changed

The variable factors alleged to have changed are the normal values, export price and the NIP.

Applicant's claims

Export price

Frutex claimed that the relevant export price in relation to the identified exporter subject to the application has changed since the imposition of measures in relation to the subject goods in 2008.

To substantiate these claims, Frutex has referred to import data pertaining to transactions between it and the identified exporter during the period April 2007 and February 2008 (the original investigation period) from which a weighted average export price of EUR█████/kg was calculated from information gathered during the original investigation. Frutex has then compared this historical weighted average export price with figures extrapolated from the material presented following the most recent duty assessment conducted by Customs and Border Protection in October 2012. Frutex asserts that the material reflects a current average export price of EUR █████/kg.

To further substantiate these claims, Frutex also provided documents reflecting a similar increase in sales price and costs (expressed in terms of EURO/KG) between 2007 and 2011 production seasons in relation to the subject goods.

We note that this information is provided summarily, via email correspondence, and as such cannot be regarded as primary commercial documentation. However, we are satisfied that the material provided relevantly reflects and is supported by Customs internal calculations in the original investigation and subsequent duty assessments, produced on the basis of verified data at the relevant periods in question.

On this basis we are satisfied of the veracity of Frutex's claim that export prices have changed since the imposition of measures pursuant to the original investigation.

Normal value

Frutex has claimed that the normal value of the subject goods has changed since the imposition of measures in 2008. Like its claims with respect to export price, Frutex posits these assertions on a prima facie comparison of normal values calculated by Customs and Border Protection for the purposes of the original investigation[7] and the normal values calculated, and applied, in the most recent duty assessment undertaken by Customs and Border Protection.

We note that, like the principle investigation, the most recent duty assessment also determined normal values pursuant to s269TAC(6). As such the methodology used in the original investigation for calculating normal value of the subject goods was replicated for the purposes of the most recent duty assessment, using updated information provided by the Australian industry for the purposes of the immediately preceding duty assessment.

On this basis we are satisfied that a comparison of calculated normal values used by Customs and Border Protection in the original investigation, and the most recent assessment of information related to Frutex is an appropriate basis upon which to consider the change to normal values (if any) for the purposes of the present application.

Whilst it is not specified in the application, the calculated FOB normal value of the subject goods from Greece used in the original investigation was EURO ████ per tonne (EURO ███ per KG). The calculated normal value applied with respect to duty assessment number 6 was EURO ███ per KG.

We are satisfied, on the basis of the above, that there is prima facie evidence to support Frutex's claims that the normal value with respect to the subject goods has changed since the imposition of measures.

NIP

In its application for a review of variable factors, Frutex indicated that it believes the NIP has changed since the imposition of measures but has not provided any further narrative, nor any supporting documentation, to articulate the basis for this view.

Considering that Frutex's other claims are substantially based upon prima facie comparison of the calculated variable factors used in the original investigation with the factors calculated in the most recent duty assessment conducted by Customs and Border Protection, we have performed the same comparison with regard to the NIP.

We note that the original investigation considered that Australian selling prices to not be an appropriate basis for calculating the Unsuppressed Selling Price

[7] For completeness, we note that normal values were calculated for the purposes of the original investigation under subsection 269TAC(6), using the verified CTMS data of the Australian industry for currants (growers and producers) during the investigation period.

(USP) for the purposes of determining the relevant NIP[8]. On this basis the original investigation used CTMS data, and cost modelling for dried currants, to determine a constructed USP. A detailed explanation is provided in REP 140.

Relevant post exportation deductions were then made to derive a NIP from the constructed USP. Using this methodology a NIP of AUD $[redacted] per tonne (AUD $[redacted] per KG) was calculated for the purposes of the original investigation.

We note that the same methodology was used to determine the NIP for the purposes of the most recent duty assessment, amended, where relevant, with regard to verified information gathered from the Australian industry. The NIP determined in the most recent duty assessment was AUD $[redacted] per tonne (AUD $[redacted] per KG).

Our assessment

As explained above, Frutex has supported its claims that variable factors have changed with respect to the subject goods on prima facie comparison between the values of each relevant factor applied in the original investigation (pursuant to which measures were originally imposed) and the correlative values of each factor calculated for the purposes of the most recent duty assessment undertaken by Customs and Border Protection. A copy of the report of Duty Assessment No 6 is at **confidential attachment 3**.

As is established above, there is continuity between the relevant methodologies used to calculate each relevant factor under consideration in the original investigation, and the most recent duty assessment. On this basis, we are satisfied that a comparison of the relevant calculated value of each variable factor in each investigation provides a reasonably robust basis upon which to determine, prima facie, whether there has been changes in the variable factors as is alleged.

As demonstrated above, prima facie, all three variable factors subject to the application appear to have experienced relatively significant change since the imposition of measures.

On this basis, we consider that the applicant has sufficiently demonstrated that variable factors have changed for the purposes of Section269ZC(2)(b)(i).

4.3 Conclusion on “reasonable grounds”

We are satisfied that there appear to be reasonable grounds for asserting the normal values, export price and non-injurious prices have changed.

Accordingly we recommend that the delegate of the CEO decide not to reject the application.

[8] Customs’ analysis of the industry’s data revealed that across the injury analysis period, Sunbeam’s unit cost to make and sell currants sold to the industrial market segment exceeded its unit sales price. In an Australian market unaffected by dumping, it is reasonable to expect that the prices for the Australian industry’s currants sold in the industrial market segment would increase to cover their CTMS

A notice for publication indicating that it is proposed to review the measures covered by the application is at **Appendix A.**

4.4 Review Period

For the purposes of this review, the period to examine the variable factors is 1 October 2011 to 30 September 2012.

4.5 Application for a revocation review

Grounds for claiming revocation

Frutex claims that there are reasonable grounds for asserting that the measures in respect of the subject goods are no longer warranted on the basis that:

a) there is no dumping or subsidisation; and
b) there is no material injury being suffered by the Australian industry.

Applicant's Claims

<u>No dumping</u>

In its application, Frutex makes the assertion that 'Greek currants are not dumped nor subsidized'. Frutex further claims that the European subsidy of Greek currants has not been in effect 'for over five years'.

In respect of the claims that currants from Greece (which, in the specific circumstances of the present application, is read to mean currants exported from Greece by Aeghion) are not dumped, Frutex has not referred to, or otherwise provided, any information or data in support of these assertions. Further, we note that there is no indication in the application as to the basis upon which Frutex holds this belief.

<u>No injury</u>

In addition to holding the belief that the subject goods are no longer being dumped by the nominated exporter, Frutex is of the view that there is no current material injury being suffered by the Australian industry. We note that, whilst not specifically articulated by Frutex in its application, by including the claim of no injury as part of its application for review, Frutex implicitly asserts that it is also unlikely to be a recurrence of injury if the measures were to be revoked.

In summary, this claim is made on the basis of three key assertions made by Frutex in the narrative of its application which are seen to be indicative of the fact that there is no current injury:

1) that the subject goods are being exported from countries other than Greece, at similar prices, without being subject to anti-dumping measures;
2) that the subject goods are being substituted by imported finished goods as a result of measures; and

3) that other factors, unrelated to imported goods, whether dumped or not, have affected the Australian industry.

1) Third party imports

Frutex have claimed that the subject goods are being imported into Australia from countries other than Greece, at similar export prices to that of the nominated exporter.

Frutex implicitly assert that the fact that imports from third countries continue, without being subject to measures similar to that imposed on imports of the goods from Greece, suggests that the Australian industry must not be suffering current injury. Whilst it is not specifically articulated, this line of reasoning would also suggest that, if there is no current injury caused by the imports from third countries, it is unlikely that injury (as established in the original investigation) will reoccur should the measures with respect to the nominated exporter be revoked.

Frutex have provided ABS import data to support their assertions with respect to third country imports, selecting South Africa and the USA as examples. We have verified that the ABS import data provided reconciles with CRE data for the corresponding countries of origin and for the relevant periods.

2) Substitution of the subject goods

Frutex also assert that, since the imposition of measures in relation to the subject goods, the two major historical retailers of the goods have switched to importing finished products containing the subject goods from New Zealand and, in doing so, avoided the imposition of measures on those imports.

Frutex have claimed that this indicates that the measures are effectively being circumvented by retailers and are ineffective. As an aside, they claim that the measures are placing a considerable financial burden upon the manufacturing sector in Australia who continue to import the subject goods.

We note that Frutex have not provided any documentation supporting their claims regarding the increase in importation of finished goods.

3) Other factors affecting the Australian industry

Finally, Frutex also suggest that a history of environmental factors has had a significant detrimental impact on the crop yields of the Australian industry from 2008 to 2011, significantly reducing available supply from the domestic industry.

Frutex suggest that these factors, coupled with the benefits of strengthening Australian dollar and USA free trade agreements and the imposition of measures on the goods from Greece, has led to an increase in manufacturers switching production to using raisins rather than the subject goods.

Whilst it is not specifically articulated in the application, Frutex appear to suggest that any current injury suffered by the Australian industry has been the result of the interplay of environmental and economic factors and is unrelated to the importation of the subject goods from their nominated exporter, dumped or not.

Our assessment

Dumping

In respect to the claims made with respect to subsidisation, we note that subsidies were not considered in the original investigation pursuant to which measures were imposed. On this basis we do not consider Frutex's claims with respect to subsidisation to have any bearing upon the present application.

In the absence of any evidence to the contrary, we have assumed that, like the claims made with respect to the alleged change in variable factors, Frutex has formed its view that the goods exported by Aeghion are not dumped on the basis of comparison of data gathered, and extrapolated, by Customs and Border Protection during the most recent duty assessment.

The preceding discussion regarding the claims regarding changes in variable factors has explained, in summary, the relevant methodologies by which the variable factors – export prices, normal value and NIP - were calculated for the purposes of calculating the repayment due to Frutex pursuant to duty assessment number six. A copy of the complete report is attached.

We note that the repayment calculation performed by the assessment team showed that the total dumping duty payable by Frutex was $[redacted] whilst the interim dumping duty paid for the assessment period was $[redacted]. As such, Frutex had overpaid, and was duly repaid, an amount of $[redacted].

We note, in summary, that assessment number six found that the total interim dumping duty paid by Frutex for the relevant assessment period exceeded the total dumping duty payable. However, the relevant calculations demonstrate that, whilst overpayment of interim duties had occurred as a result of interim duties collected exceeding the calculated value of dumping duties actually payable (on the basis of the re-assessed variable factors), the goods exported by Aeghion were still subject to some measure of anti-dumping duties.

On the basis of the above, and in the absence of any other evidence to support the assertions to the contrary made by Frutex, we consider that there are no reasonable grounds to consider that the subject goods are no longer being dumped.

Injury

We are of the view that the claims made by Frutex that there is no current injury being suffered by the Australian industry, and that injury is unlikely to reoccur if measures were revoked in relation to the nominated exporter, are not sufficiently substantiated in the narrative of the application, nor is there supporting material provided from which such inferences could be made.

In relation to the claims made with respect to third country imports of the subject goods, we accept the veracity of the data provided by Frutex regarding the volume, and relevant value, of imports of the subject goods from third countries which are not subject to the measures at issue. However, we do not consider that the fact that such imports are occurring without measures supports a

conclusion that the Australian industry is not currently suffering injury, or that injury would not reoccur should the measures in relation to the nominated exporter be revoked.

With respect to the claims made regarding the substitution of imported finished goods by retailers in response to the imposition of measures, we consider that the applicant has not furnished any documentation which would support the veracity of this claim. Further, notwithstanding the absence of such supporting documentation we do not consider the asserted facts to support a belief that the Australian industry is not currently suffering injury, nor that injury is unlikely to reoccur should measures be revoked.

Finally, we note that Frutex's submissions regarding the environmental and economic factors affecting the Australian industry are not supported by evidence or supporting information. Further, we are of the view that, prima facie, Frutex's unsubstantiated claims merely indicate that injury is currently being suffered by the Australian industry as a result of factors unrelated to the importation of the subject goods. We do not consider that there is any logical basis upon which it could be claimed that this fact, even if supported by verifiable evidence, indicates that injury caused by imported dumped products would not reoccur should measures be revoked.

4.6 Conclusion on “reasonable grounds”

We are satisfied, on the basis of the application and supporting evidence provided by Frutex and all available relevant material, that there do not appear to be reasonable for asserting that the anti-dumping measures are no longer warranted.

Accordingly we recommend that the delegate of the CEO decide to reject the application to the extent that it seeks the revocation of the anti-dumping measures.

5 List of Attachments

Appendix A	Public notice of initiation of variable factors review
Confidential Attachment 1	Details of imports from Customs and Border Protection database (10 October 2007 to 30 August 2012)
Confidential Attachment 2	Report no.140
Confidential Attachment 3	Report of Duty Assessment No.6

Appendix A

Customs Act 1901 – Part XVB

Processed dried currants exported from

Greece

Initiation of a review of variable factors for single exporter

Notice under s.269ZC(4)

The Chief Executive Officer (CEO) of the Australian Customs and Border Protection Service (Customs and Border Protection) will undertake a review of the variable factors relevant to the taking of the measures (export price, normal value and non-injurious price) applying to processed dried currants exported to Australia from Greece by the exporter Agricultural Co-op Union Aeghion. The review will commence on 24 October 2012.

The goods subject to anti-dumping measures, in the form of a dumping duty notice, are processed dried currants. The measures apply to all exporters from Greece. Processed dried currants are classified under sub-heading 0806.20.00, statistical code 29, in Schedule 3 to the *Customs Tariff Act 1995*. The rate of duty from Greece is 5%.

Interested parties are invited to lodge written submissions concerning the review not later than 15 November 2012 with:

The Director
Operations 1, International Trade Remedies Branch
Australian Customs and Border Protection Service
5 Constitution Avenue
Canberra ACT 2601

or by email tmops1@customs.gov.au, or fax number 02 6275 6990.

Confidential submissions must be clearly marked "For Official Use Only" and be accompanied by two non-confidential versions suitable for placement on the public record. All non-confidential submissions will be placed on the public record for this inquiry together with a copy of all relevant correspondence between Customs and Border Protection and other persons.

A statement of the essential facts on which the CEO proposes to base a recommendation to the Minister for Home Affairs (the Minister) will be placed on the public record by 28 January 2013, or such longer period as the Minister allows. Interested parties are invited to lodge submissions in response to the statement of essential facts within 20 days of that statement being placed on the public record. These submissions should also be lodged with Customs and Border Protection at the above mail, fax or email addresses. A report and recommendation to the Minister will be made on or before 5 March 2013 (or such longer period as the Minister allows).

Particulars of the reasons for the decision to initiate this review are shown in Consideration Report No. 191 (CON 191) held on the public record. Interested parties wishing to examine the public record may do so on the internet at adpr.customs.gov.au/Customs or at Customs House, 5 Constitution Avenue, Canberra ACT during business hours by contacting International Trade Remedies office management on telephone number 02 6275 6547. CON 191 and all Australian Customs Dumping Notices are also available on the Customs and Border Protection website at www.customs.gov.au.

Enquiries about this notice may be directed to the case team on telephone number 02 6245 5434 or email tmops1@customs.gov.au.

Michael Kenna
Delegate of the Chief Executive Officer
24 October 2012