

**Melbourne**

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31 July 2018

Case Manager  
Investigations 2  
Anti-Dumping Commission  
Level 35  
55 Collins Street  
Melbourne Victoria 3000

Email: [investigations2@adcommission.gov.au](mailto:investigations2@adcommission.gov.au)

Dear Sir/Madam

**Exemption Investigation No. 0066 – HDAN exported from the Russian Federation**

Orica Australia Pty Ltd ("Orica") is an Australian manufacturer of ammonium nitrate ("AN"). Orica manufactures AN at two sites – Yarwun, Queensland and Kooragang Island, New South Wales.

Orica has reviewed the application for exemption from anti-dumping measures by Nitro Sibir Australia ("NSA") for high density ammonium nitrate ("HDAN") imported from the Russian Federation ("Russia").

Orica is opposed to the granting of an exemption from dumping duties for HDAN imported from Russia that is used in the manufacture of emulsion explosives for a number of reasons:

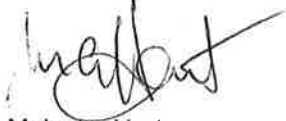
- (a) There are other alternative forms of AN available today to be sourced in Australia which can be readily used for the same application purpose as that outlined by the applicant
- (b) Density is not the most discerning factor relating to suitability for use as an emulsion raw material, and hence is not a factor in determination of dumping measures
- (c) Sourcing of suitable AN is also possible from other countries where dumping is not prevalent
- (d) Unwillingness to purchase these alternatives is not sufficient grounds for revocation of the measures against Russia
- (e) The market conditions by which the ADC determined dumping exists in Russia are still in place

Orica has completed the Response to the Exemption Application. Orica has also included confidential sales information evidencing sales of locally produced like goods throughout the most recent twelve month period in support of its objection submission. This sales

information is commercially sensitive and is not for viewing other than by the Anti-Dumping Commission.

If you have any questions concerning the attached response, please do not hesitate to contact me on (03) 9665 7309 or Orica's representative Mr John O'Connor on (07) 3342 1921.

Yours faithfully



Malcolm Hart  
Senior AN Market Manager – APA