

21 December 2012

Ms Andrea Stone  
Case Manager  
Operations 3  
International Trade Remedies Branch  
Australian Customs and Border Protection Service  
Customs House  
5 Constitution Avenue  
CANBERRA ACT 2601

**Public-File**

Dear Ms Stone

**Re: Continuation and Review Inquiries – 2,4-Dichlorophenoxyacetic acid exported from the People's Republic of China – Addendum to Nufarm Limited submission on Statement of Essential Facts No. 189A and 189B**

I refer to Nufarm Limited's ("Nufarm") submission in response to Statement of Essential Facts No. 189A and 189B dated 17 December 2012.

Nufarm's submission refers to the determination of a "constructed" 2,4-D normal value by Customs based on unverified data derived from a recent duty assessment. In our submission we highlighted that this approach would establish a dangerous precedent; we recommended that Nufarm's verified Selling and General Administration ("S, G&A") expense data should be used as a basis of determining the 2,4-D normal value. The "constructed" 2,4-D normal value determination should also include the verified rate of profit achieved on Nufarm's domestic sales of Estercide 680.

If you have any questions concerning this letter, please do not hesitate to contact me.

Yours sincerely

[signed on original]

Bernard lee  
Manager Industry and Government Affairs

