

25 November 2013

SPC Ardmona Operations Limited
ABN 60 004 077 105

Ms Joanne Reid
Director, Operations 3
Anti-Dumping Commission
C/o Australian Customs and Border Protection Service
Customs House
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CANBERRA ACT 2601

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Dear Ms Reid,

Subject: Response to Trade Law Chambers (South Africa) submission dated 14 November 2013

SPC Ardmona (SPCA) disagrees with the statements in the submission by the Trade Law Chambers on behalf of Rhodes Foods Group (Pty) Ltd (RFG) and Langeberg & Ashton Foods (Pty) Ltd (L&AF) dated 14 November 2013.

SPCA believes that exports of preserved and prepared peaches to Australia by L&AF and RFG were at dumped prices and that dumping is significant and has caused, and continues to cause, material injury to the Australian industry producing like goods.

SPCA would again like to reiterate for the records that:

- SPCA has tendered for various private label contracts for over the years. SPCA's inability to win the contracts was due to price suppression and price undercutting faced by SPCA, due to the cheap imports from South Africa.
- Domestic supply of raw peaches was not a constraint in SPCA's ability to supply domestic demand of preserved and prepared peaches. At all times during the investigation period, supply of raw peaches exceeded the domestic demand.
- Injury has been caused to SPCA in form of loss of profitability and capacity utilization due to loss of market share in the domestic market and price suppression and price depression caused by imports from South Africa.

We trust that the Commission will take into account the information and evidences provided by SPCA in our application, during the industry visit and discussions. Please do not hesitate to contact us if any further information is required.

Yours sincerely,



Peter Kelly
Managing Director