



18 July 2016

NON-CONFIDENTIAL

Mr Con Soumbassis
Acting Case Manager
Anti-Dumping Commission
Level 35
55 Collins Street
Melbourne VIC 3000

Dear Mr Soumbassis,

SEF NO. 334: FSI PINEAPPLE FROM THAILAND

This submission, made on behalf of Siam Agro-Food Industry Public Co Ltd (“SAICO”), is in response to SEF No. 334 (“the SEF”).

It is acknowledged in the SEF that Golden Circle imports FSI pineapple from Thailand (dumped product) to service its customer base.¹ We bring to your attention Article 4.1(i) of the Anti-Dumping Agreement (“ADA”) which states:

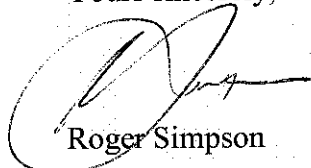
When producers are related to the exporters or importers or are themselves importers of the allegedly dumped product, the term “domestic industry” may be interpreted as referring to the rest of the producers.

It follows that Golden Circle cannot be considered a “domestic industry” for the purpose of anti-dumping.

We reiterate our submission of 1 June 2016 to the effect that the anti-dumping measures that have been in place since 2001 have been ineffective and should not be continued, as to continue them will have a negative downstream effect with no meaningful benefit to Golden Circle.

It should be taken into account by the Commission that Golden Circle’s focus is on its consumer pineapple operations to which it preferably allocates its available pineapple fruit. Golden Circle is a “non-event” in the Australian market for FSI pineapple, notwithstanding 15 years of anti-dumping protection.

Yours sincerely,



Roger Simpson

¹ SEF No. 334, section 5.3.1.