

PUBLIC VERSION



J.BRACIC & ASSOCIATES
TRADE REMEDY ADVISORS

PO Box 3026
Manuka, ACT 2603
Mobile: +61 499 056 729
Email: john@jbracic.com.au
Web: www.jbracic.com.au

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The Director
Operations 3
Anti-Dumping Commission
GPO Box 1632
Melbourne VIC 3001

Expiry review of FSI pineapple exported from Thailand

Dear Director,

This submission is made on behalf of Prime Products Industry Co. Ltd (PPI) in response to the Anti-Dumping Commission's (the Commission) Statement of Essential Facts Report No 334 (SEF 334).

PPI submits that the Commission's preliminary findings in SEF 334 provides ample positive evidence to support a finding that dumping duties are no longer warranted on exports of FSI pineapple from Thailand. This includes the following facts:

- interim dumping duties have been in place for nearly 15 years and despite this Thai exports continues to grow and represent the largest share of the Australian market;
- the market share of the Australian industry continues to decline;
- over the past 5 years, the Australian industry has itself commenced importing product from Thailand and Indonesia, which now exceeds its own self-produced like goods;
- a prolonged supply shortage of fresh pineapples in Australia has severely impacted the Australian industry's ability to meet local demand for FSI pineapple, without impacting on its sales of consumer pineapple;
- no evidence that the fresh pineapple supply shortage in Australia will end in the foreseeable future;
- the Australian industry continues to experience losses on its sales of FSI pineapple despite anti-dumping measures being in place for almost 15 years, and
- the higher cost of Australian fresh pineapple continues to impact on the Australian industry's ability to remain competitive in the local market.

In addition to these factors that support the expiration of the anti-dumping measures, PPI also notes that it has never exported FSI pineapple products to Australia at dumped prices, and that the preliminary dumping margin outlined in SEF 334 is plainly incorrect. PPI is not interested in gaining market share in export markets at the expense of a reasonable return on its investment. This is demonstrated by its export prices during the review period which were significantly above the applicable floor price for PPI's goods.

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Notwithstanding PPI's efforts to ensure its exports to Australia remained profitable and competitive during a period of great volatility in Thai fresh pineapple prices, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [Confidential export sales information].

Yours sincerely

John Bracic