



**ROGER D. SIMPSON & ASSOCIATES PTY. LTD.**

**ANTI – DUMPING SPECIALISTS**

ACN 056 514 213 ABN 87 056 514 213

2 July 2014

Mr Dale Seymour  
Commissioner  
Australian Anti-Dumping Commission  
1010 Latrobe St  
Docklands Vic 3008

Dear Mr Seymour,

**QUICKLIME FROM THAILAND**

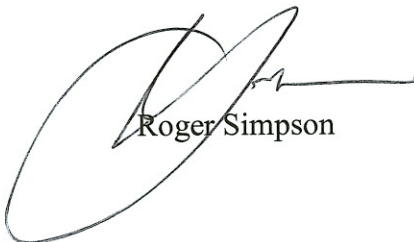
This submission, made of behalf of Cockburn Cement Ltd (“Cockburn”), is in response to the submission of Chememan Company Ltd (“Chememan”) of 25 June 2014 to the subject investigation.

Concerning the duration of the investigation, there is no statutory time limit for Australian anti-dumping investigations. Customs and the Commission are solely responsible for the extraordinary length of time being taken to complete this investigation, while Cockburn has suffered cumulation of material injury because of dumped imports from Thailand throughout this extraordinarily long period.

With regard to the question of the materiality of the injury caused by imports from Thailand, it has been found by Customs, the Trade Measures Review Officer and the Anti-Dumping Review Panel during the investigation that imports of quicklime from Thailand between March and June 2010 have caused material injury to Cockburn.

Customs and the Commission have very thoroughly examined the question of whether it is open to them to determine whether injury suffered prior to the investigation period has been caused by dumping by extending the investigation period or otherwise and has found that it is open to them to do so. The Federal Court judgments cited by Chememan do not provide precedent for changing this position.

Yours sincerely,



Roger Simpson