

PUBLIC
FILE 5



March 19, 2012

The Director Operations 2
International Trade Remedies Branch
Australian Customs and Border Protection Service
Customs House
5 Constitution Avenue
Canberra ACT 2601

Dear Sir,

The Western Australian Farmers Federation (Inc.) (WAFarmers) thanks you for the opportunity to comment on the Australian Customs and Border Protection Service's investigation into the alleged dumping of formulated glyphosate (Australian Customs Dumping Notice No. 2012/05).

As background, WAFarmers is the State's largest and most influential rural lobby and service organisation. WAFarmers represents approximately 4,000 Western Australian farmers from a range of primary industries including grain growers, meat and wool producers, dairy farmers, pastoralists, horticulturalists, commercial egg producers and beekeepers.

Collectively our members are major contributors to the \$7.1 billion gross value of production that agriculture in its various forms contributes annually to Western Australia's economy. Additionally, through differing forms of land tenure, our members own, control and capably manage many millions of hectares of the State's land mass and as such are responsible for maintaining the productive capacity and environmental well being of that land.

In this submission, WAFarmers limits its comments to the potential impact on our members, should an outcome of this investigation be the introduction of a 'dumping duty'. The imposition of a dumping duty will have two effects, the short term effect is an increase in the cost of all relevant glyphosate products, and WAFarmers has been advised that this increase will happen almost immediately that a duty is introduced. The



longer term impact, will be that it will effectively set a new 'floor price' for these products, delivering an ongoing, significant cost increase to farmers.

These outcomes are undisputable, unlike some of the applicant's arguments. WAFarmers notes that the Australian Customs and Border Protection Service's Consideration Report No. 183 comments:

7.12 Conclusion on material injury caused by dumped imports

"It appears that dumping has caused injury to the applicants in the form of lost sales volume, lost market share, reduced revenues and increased inventory levels. However, it does not appear, from the evidence presented in the application, that the applicants have suffered, or that dumping has caused the applicants to suffer, injury in the form of price depression, price suppression, lost profit or reduced profitability."

WAFarmers believes that the imposition of a dumping duty for glyphosate would be both a retrograde step and one which imposes an unfair burden on Australian farmers. This hardly seems a considered or reasonable outcome to a problem which appears to have been generated within the applicants business, rather than through the importation of glyphosate.

In closing, WAFarmers thanks you for your consideration of this submission. Should you wish to discuss the content of this submission prior to that time, please do not hesitate to make contact with myself or WAFarmers Director of Policy, Alan Hill on 9486 2100.

Yours sincerely

A handwritten signature in black ink, appearing to read "Mike Norton".

Mike Norton
President