

Ref. No. PP.01/ 445 /DAG.6/SD/09/2023.

Jakarta, 8 September 2023.

The Director, Investigations Unit 1
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

Attention: Dr. Bradley Armstrong PSM
Anti-Dumping Commissioner

Re: Government of Indonesia's Comments concerning the Initiation of Anti-Dumping Investigation on Food Service and Industrial (FSI) Pineapple Exported from the Republic of Indonesia and the Kingdom of Thailand (628).

Dear Mr. Armstrong,

Directorate of Trade Defense, Ministry of Trade of the Republic of Indonesia (hereinafter - Government of Indonesia or "GOI") takes the opportunity to refer to the Australian Government Notification of Anti-Dumping Notice ("ADN") No. 2023/047 dated 4 August 2023. The GOI hereby would like to extend its comments before the Australia Anti-Dumping Commission ("AADC") regarding margin dumping calculation for Indonesia, as follows:

1. Based on Chapter 5.3 of the Consideration Report No. 628, the GOI is of the view that AADC has not explained in detail concerning any selling expenses that possibly incur during transaction process between retailer and Indonesian producer such as warehouse rent expense, promotion expense, etc in order to assess normal value calculation. As such, the GOI requests AADC to also consider such expenses which are necessary to be adjusted for the reason that they can affect the price comparability in accordance with Article 2.4 of the Anti-Dumping Agreement.
2. AADC has to consider carefully the usage of transportation cost adjustments in the past period in calculating normal value for Indonesia since the adjustments have to be representative to the recent investigation period. We believe that the matter should be examined by AADC in terms of its accuracy and adequacy to initiate an investigation in accordance with Article 5 of the Anti-Dumping Agreement.
3. The normal value estimation methodology at page 12 of the Consideration Report No. 628 applies the consumer pineapple brands sold in multiple retail / supermarket settings rather than that of FSI pineapple, while the GOI considers that the later one is more relevant to apply pertaining to the fair comparison requirement between the export price and the normal value which is stated in the Article 2.4 of the Anti-Dumping Agreement.

The GOI expects AADC to conduct a fair, transparent as well as objective examination based on facts and not merely on allegation, conjecture or remote possibility.
Thank you for your positive consideration and cooperation.

Yours Sincerely,



Natan Kambuno

Director of Trade Defense

Cc.:

1. Director General of Foreign Trade, Ministry of Trade of the Republic of Indonesia;
2. Ambassador of Indonesia in Canberra, Australia accredited to the Republic of Vanuatu;
3. Ambassador of Australia in Jakarta, Indonesia;
4. Secretary of Directorate General of Foreign Trade, Ministry of Trade of the Republic of Indonesia;
5. Trade Attaché of the Republic of Indonesia in Canberra, Australia accredited to the Republic of Vanuatu.