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Anti-Dumping Commission
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Public File

Anti-Dumping Investigation No. 627 – Consumer Pineapple exported from the Republic of Indonesia
Anti-Dumping Investigation No. 628 – Food Service Pineapple exported from Indonesia and Thailand

1. Introduction

Golden Circle Limited (**GCL**) is the Australian manufacturer of consumer and food service pineapple, and was the applicant company that requested the above-noted investigations (**INV 627** and **INV 628**). GCL makes the following submission in relation to the Anti-Dumping Commission's (**the Commission**) assessment of the Indonesian exporter PT Great Giant Pineapple (**GGP**) according to the recently published Exporter Verification Reports (**EVR's**). Given the related and parallel nature of these inquiries, this submission addresses matters relevant to both.

2. Indonesian customer/supplier related parties

The Commission has found that the following GGP subsidiaries are involved in the production and sale of the goods relevant to both inquiries, in the capacity of either a related customer or supplier:¹

Subsidiary name	Activities/function	Related customer/supplier
Bromelain Enzyme	A joint venture (JV) producing bromelain enzyme from pineapple stems and is sold to a variety of unrelated industries, such as cosmetic and pharmaceutical.	Customer
Inbio Tani Nusantara	Producer and distributor of liquid bio-organic (LOB) fertiliser. LBO is produced from plantation waste (pineapple, casava and other plants). The liquid organic bio fertiliser is used to supplement externally purchased fertiliser to grow pineapples.	Customer and supplier

¹ INV 627/628 EVR, p. 4-5.

Great Giant Livestock	A cattle feedlot operation. Instead of wasting pineapple skin, GGP uses pineapple peels for animal feed.	Customer
Confidential (subsidiary inland transport company)	Inland transport services. Picks up containers from the GGP cannery and delivers to the port or domestic customer. Also picks up containers from the port and delivers to the cannery for filling/packing.	Supplier
Sewu Primatama Indonesia (SPI)	Closed from July 2023, with activities then performed by SSN. Acted as a distributor of canned pineapple and milk to domestic Indonesian retailers.	Customer
Sewu Segar Nusantara (SSN)	Replaced SPI as domestic distributor of canned pineapple. SSN also use SKT services. SSN's activities have expanded and included distribution of fresh and canned fruit.	Customer
Confidential (holding company)	Holding company for subsidiary traders internationally.	Customer

In terms of related party suppliers, the Commission has found that pineapples had not been purchased from third party suppliers (related or otherwise), that tinplate raw material was sourced from unrelated suppliers in Japan, Korea and Taiwan, and that no other materials were supplied by related parties.²

GCL refers to the inland transport services supplier tabled above (name of the subsidiary confidential), who provides transportation services for the goods. No consideration/assessment is made by the Commission in either the INV 627 or INV 628 EVR as to whether the provision of freight services by this supplier is at arms-length, and what impact this may have on the deduction normal value adjustment for domestic inland transport. Where related party domestic freight transactions are found to be non-arms-length, they should be excluded from the deduction.

Regarding the related party customer SPI, the Commission found in GGP's INV 627 EVR that it did not pay the invoice price of the goods, and that the price of the goods was offset against other transactions and commissions.³ The Commission hence concluded that GGP's domestic sales to SPI were not arms length.⁴ The Commission does not however mention whether these transactions were excluded from the normal value assessment. GCL requests that the Commission clarify the treatment of sales to SPI.

GCL also requests that the Commission clarify the reference to *SKT services* as relating to SSN. By its reference, SKT appears to be a service provider in relation to the goods. This entity is not referenced elsewhere in either of the INV 627 or INV 628 GGP EVR's.

² INV 627/628, p. 21.

³ INV 627 EVR, p. 25.

⁴ Ibid.

Should you have any queries regarding this submission, please contact GCL's representative Mr Chad Uphill.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Mike Pretty', with a stylized flourish at the end.

Mike Pretty
Non-Executive Chairman – Kraft Heinz Australasia