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27 April 2012

Ms Christie Sawczuk
Customs & Border Protection Service
5 Constitution Avenue
Canberra City ACT 2601

Dear Christie

Anti Dumping Investigation No 183 – Formulated Glyphosate products from China - Australian Industry Response to interested party submission of interested parties.

We refer to the submissions from interested parties that have been placed on the Public File in relation to the above investigation. We set out below our specific comments in relation to the issues that we believe are relevant to the investigation.

Unregistered/Under specification glyphosate products

A number of the submissions on the Public File make reference to unregistered and off specification products being sold in Australia. The Australian industry is aware that these issues have been raised with the Australian Pesticide and Veterinary Medicines Authority (APVMA) and other government agencies by Croplife and others.

These products represent a threat to Australia agriculture, particularly in export markets due to residue, contamination and other risks. However, these product integrity issues should not be confused with this anti-dumping investigation. The vast majority of the imported formulated glyphosate products from China are registered products and there is no evidence to suggest that these products do not comply with the product specifications approved by the APVMA.

Agrichem Manufacturing Industries Pty Ltd T/A Agronomiq Presentation To Australian Customs And Border Protection Service, Wednesday 22nd February 2012

- This submission makes a number of comments and suggestions regarding the 62% IPA salt. Our letter of 19 March 2012 makes it clear that the "salts of glyphosate" are like good for the purposes of this investigation. The Agrichem presentation confirms that there is considerable scope for circumvention of anti-dumping measures if the "salts of glyphosate" are not included.
- At page 3 of its presentation, Agrichem details the rapid growth of its formulated glyphosate imports over recent years. It also forecasts continued growth of the volumes to 15 Million litres by 2014/15. This forecast supports the Australian industry's contention that injury to the local industry is likely to continue and be material should a measure not be imposed.

Agrichem Manufacturing Industries Pty Ltd (T/A Agronomiq) on behalf of Australian Independent Rural Retailers (T/A AIRR)

- This submission reiterates much of the above presentation.



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- This submission makes a number of references to the difference between the surfactants (wettors) used in products sold for use on the Chinese domestic market and those used in the manufacture of the products exported to Australia. The submission confirms that the surfactants in Chinese domestic market products are cheaper and lower quality. This highlights the importance of an appropriate due allowance to take account of those differences.

Pacific Agriscience Manufacturing Industries Pte Ltd – 7 March 2012

- This submission provides further evidence of the need for a due allowance to take account of the difference between the surfactants used in product destined for the domestic market and those that have been exported.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Bernard Lee', written over a circular stamp or mark.

Bernard Lee
Industry & Government Affairs Manager