

Director Operations 1
International Trade Remedies Branch
Australian Customs and Boarder Protection Service
Customs House
5 Constitution Avenue
CANBERRA ACT 2601

3 February 2012

Dear Officer

Investigation re quicklime exported from Thailand

We act for BHP Billiton Worsley Alumina.

BHP Billiton Worsley Alumina makes this submission concerning the publication of Issues Paper No. 2012/179.

1 About BHP Billiton Worsley Alumina and its use of quicklime

We refer to our letter of 9 December 2011 for detailed information regarding BHP Billiton Worsley Alumina and its use of quicklime as part of its bauxite refining operations.

2 Observations about the market for quicklime

2.1 We refer to our letter of 9 December 2011 for detailed information regarding the quicklime market in Western Australia.

2.2 We confirm BHP Billiton Worsley Alumina's concern that the anti-dumping rules are not used by an incumbent in a market to limit competition.

3 BHP Billiton Worsley Alumina's views on the future threat of material injury caused by dumped exports

3.1 BHP Billiton Worsley Alumina recognises that, notwithstanding there has been a nil or negligible past or present injury caused to Cockburn Cement in the non-alumina and alumina sectors of the Western Australian quicklime market due to dumped exports of quicklime from Thailand, it is open to Customs and Border Service to find that there is a future threat of material injury caused as a result of those dumped exports.

3.2 In the event that such a finding is made, BHP Billiton Worsley Alumina requests that any interim dumping duty or price undertaking imposed on exporters by Customs and Border Services is set as low as possible in order to avoid:

- (a) adversely affecting the price at which quicklime is available for purchase for use in the alumina sector of the quicklime market in Western Australia; and
- (b) limiting competition in the quicklime market in Western Australia.

If you would like further information in relation to this submission please let us know.

Yours sincerely

[Sgd] DJPERKS