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PUBLIC FILE

June 20, 2012

Ms Christie Sawczuk
Manager International Trade Remedies Branch
Australian Customs and Border Protection Service
5, Constitution Avenue
CANBERRA ACT 2601

Dear Ms Sawczuk,

Re: Anti-dumping duty on Chinese formulated Glyphosate — Standard formulations

With reference to our submissions dated 7 March 2012 and June 11, 2012, we now wish to refer to the "Industry Presentation to Customs and Border Protection" dated 17 April, 2012.

On the page marked "Public File 136" sub-titled "Glyphosate Formulations", "the industry" attempted to make a comparison of the so-called "China Standard Product" and "Australia Standard Product". The formulation cited for the former is 360g/L Glyphosate acid while the one cited for the latter is 450g/L Glyphosate acid.

The last respective bullet point for each of the two nominated "standard products" had it that there were 40 million litres of 360g/L formulation consumed

in China in 2007 (citing data from CCM's 2008 report) and estimated that 40-50 million litres of the 450g/L formulation were consumed in Australia in 2011.

"The industry" omitted that the CCM 2008 report also stated that in 2007, 450,000,000 litres of Glyphosate 10% were also consumed in China! (Email evidence is attached but has been marked CONFIDENTIAL)

So, based on the CCM 2008 data, forty million litres of Glyphosate 360 and four hundred and fifty million (450, 000,000) litres of Glyphosate 10% were consumed in China in 2007.

Ms Sawczuk, please make your own judgment as to whether a formulation with a volume of 40,000,000 litres or the other one with 450,000,000 litres should be "the standard product" in China.

To recap what we stated in our first submission dated 7 March 2012, the most commonly sold and used Glyphosate formulation in China during the period being investigated is indeed the 10% formulation derived from waste material arising from the production of Glyphosate Acid or Technical. Neither the 40,000,000 Litres of Glyphosate 360g/L nor the much larger 450,000,000 litres of Glyphosate 10% are like goods to the 40-50 million litres of the 450g/L formulation that "the industry" has cited or nominated as the "Australia standard product".

Sincerely,



C S Liew
Managing Director