

GLENCORE

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For the Public Register

20 March 2020

The Director, Investigations 2
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2600

By email: investigations2@adcommission.gov.au

**Reinvestigation of case 473 / ADRP Review No. 107 – Ammonium Nitrate exported from
China, Sweden and Thailand**

We refer to the draft Anti-Dumping Commission (**ADC**) Report dated 6 March 2020, being a Reinvestigation of Certain Findings in Investigation 473 (**Reinvestigation Report**).

Aside from some discrete matters (such as the double counting of profit on one contract and the decision not to multiply profit foregone by the proportion of the applicants' share of the total Australian industry volume), the Reinvestigation Report does not address the concerns Glencore has advanced before the Anti-Dumping Review Panel (**ADRP**).

Glencore maintains that the reasoning and result reached by the ADC are flawed for the reasons previously set out in its submissions to the ADC and the ADRP.

Yours sincerely,



Darren Oliver

Glencore Coal Assets Australia Pty Ltd