



Republic of the Philippines
OFFICE OF THE SECRETARY
Elliptical Road, Diliman
1100 Quezon City

02 June 2022

The Director

Investigations 2
Anti-Dumping Commission
GPO Box 2013
CANBERRA ACT 2600

Dear Sir/Madam:

The Philippines Department of Agriculture would like to convey its disappointment on the findings, reflected in the Preliminary Reinvestigation Report on Consumer Pineapple for the Anti-Dumping Review Panel (ADRP), of Australia's Anti-Dumping Commission that the expiration of the anti-dumping measure on consumer pineapple as they relate to exporters from the Philippines would lead, or would likely to lead, to a continuation or recurrence of the material injury that the measure is intended to prevent.

We are of the view that the material injury being experienced by the Australian industry, represented by Golden Circle, cannot be attributed solely on the importation of consumer pineapples from the Philippines. As stated in the report, the following were considered by the Commission, which we believe are substantial factors that caused, or are causing injury to the industry:

1. **Golden Circle's production reduced from 2017 to 2020 due to supply constraints of raw materials.** We are of the view that this largely contributed to the reduction of productivity and failure to meet local consumer demand, consequently, reducing profit of the local industry; and
2. **Presence of significant and increasing volume of low-priced consumer pineapples from Indonesia,** which captured a substantial share in the Australian market.

In view of the above, the material injury on Golden Circle was not a direct consequence of the importation of consumer pineapples from the Philippines.

Further, we would like to reiterate our long-standing request that the Philippines be given "fair comparison" in calculating and establishing the margin of dumping of consumer pineapples imported from the Philippines. Dole Philippines Inc. (DPI) has disputed the calculation of the dumping margin, as the Commission did not make proper adjustment on the normal value of DPI's consumer pineapples. If proper adjustment was made, there would be no dumping margin, therefore, there would not be any dumping case on this matter.

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In this regard, we would like to call the attention of the Commission and the Department of Industry, Science, Energy and Resources, to uphold the decision of the Acting Minister for Industry, Science and Technology on 06 October 2021 to discontinue the imposition of the said measure based on the findings of the Commission reflected in the Final Report – REP 571 & 572.

In view of the foregoing, the Philippines urges Australia to, once and for all, terminate the imposition of this 16-year anti-dumping measure on consumer pineapples from the Philippines.

Thank you.

Very truly yours,



NOEL A. PADRE

Assistant Secretary Designate for
Policy, Research and Development

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