

PUBLIC VERSION



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Director, Investigations Unit 4
Anti-Dumping Commission
GPO Box 2013
CANBERRA ACT 2601
AUSTRALIA

Expiry review of consumer pineapple exported from Thailand

Dear Director,

This submission is made on behalf of Prime Products Industry Co. Ltd (PPI) in response to the Anti-Dumping Commission's (the Commission) Statement of Essential Facts Report No 572 (SEF 572).

PPI fully concurs with the Commission's findings that measures on consumer pineapple exports from Thailand are no longer warranted to prevent material injury from recurring. Those findings are clearly supported by the thorough analysis undertaken by the Commission, showing that sales of like goods made by the Australian industry, are disassociated from Thai imports.

On the question of likelihood of future dumping in respect of PPI, it is important to note the following:

- prior to this expiry review, PPI have never been found to have exported either consumer or FSI pineapple at dumped prices;
- the low dumping margin of 3.8% was based on a small volume of exports across the inquiry period, compared to a miniscule volume of domestic sales made in a single quarter of the inquiry period;
- the profit margin achieved on its export sales across the inquiry period was approximately ■%.

The points above do not confirm that PPI is likely to continue to export at dumped prices, given that the calculated margin effectively represents a snapshot taking into account domestic sales in a single quarter. On the contrary, PPI contends that the historical evidence available to the Commission with regards to PPI's export pricing behaviour, provides sufficient evidence that future dumping is not likely.

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Therefore, PPI submits that measures applicable to its exports of consumer pineapple are no longer warranted, as there is insufficient evidence that dumping and/or material injury is likely to recur in the absence of the measures.

Yours sincerely

John Bracic