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Director, Investigations 2
Anti-Dumping Commission
GPO Box 2013
CANBERRA ACT 2601
AUSTRALIA

Reinvestigation - Consumer pineapple exported from Thailand

Dear Director,

This submission is made on behalf of Prime Products Industry Co. Ltd (PPI) in response to the reinvestigation being conducted by the Australian Dumping Commission (the Commission).

As stated during the expiry review, PPI fully supported the Commission's findings that measures on consumer pineapple exports from Thailand are no longer warranted to prevent material injury from recurring. Those findings were 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.

In particular, PPI wishes to highlight the following facts which support the Commission's original findings:

1. Exports of consumer pineapple to Australia by PPI totalled a mere [REDACTED] kgs, which represents a tiny fraction (approximately [REDACTED]%) of PPI's total export volume to all countries, and also a miniscule fraction of the total Australian market.
2. The chart at figure 2 of the Commission's final report confirms that exports from Thailand were a minor source of supply relative to Indonesian exports, Philippine exports and even the Australian industry's own imports.
3. PPI's exports of the subject goods were of [REDACTED] and [REDACTED] cans. Importantly, whilst the [REDACTED] g can sizes fall within the consumer pineapple goods description, those goods were imported and sold into the food service sector. That is, the [REDACTED] g cans are preferred by smaller food service businesses such as [REDACTED] that do not require the volume of a 3kg can. Therefore, these exports did not and do not compete in the retail market against similar sized cans sold by the Australian industry.

PUBLIC VERSION

4. Finally, due to seasonal availability of raw pineapple in Australia, there are periods throughout the year when the Australian industry simply cannot meet its customer's requirements. This is evident by the Australian industry's own need to import. In these situations, customers are forced to seek import alternatives. Again, this is a factor unrelated to Thai exports.

Therefore, PPI reiterates that the measures applicable to exports of consumer pineapple from Thailand are no longer warranted, as there is an obvious disconnect between the Australian industry's performance, and Thai exports.

Yours sincerely

John Bracic