

23 June 2022

The Director, Investigations  
Anti-Dumping Commission  
GPO Box 2013  
Canberra ACT 2601  
Australia

**Re: Investigation 605 - Ammonium nitrate from Chile, Lithuania, Vietnam**

AECI Australia Pty Ltd, through its trading division AEL Mining Services, is an interested party in this investigation, having been the importer of ammonium nitrate that was exported to Australia in the investigation period.

A letter on behalf of the applicant group of Australian industry companies, dated 20 June 2022 and placed on the public record just yesterday, asks for a change to the period for dumping assessment in this investigation. It is stated that "the dumping margins should be assessed over a longer period than the standard twelve month period".

I am advised by our lawyers in this matter that under the Customs Act the Commissioner is prevented from varying the length of the investigation period which has been defined in the official notice of initiation. The notice says that exports of the goods to Australia during the period 1 April 2021 to 31 March 2022 will be examined to determine whether dumping has occurred.

AEL asks that you acknowledge that the investigation period is unable to be changed and that the investigation will proceed in accordance with the terms of reference that have already been announced.

Yours Faithfully



Dean Elliott  
Director