



Vinacomin - Mining Chemical Industry Holding Corporation Ltd. (MICCO)
Phuong Liet -Thanh Xuan District -Hanoi -Vietnam
Tel: 84 -24 - 38642851 | Fax: 84 - 24 - 36648245
Website: www. micco.com.vn

Date : 28th June, 2022
To : ANTI-DUMPING COMMISSION
Attn : : Mr Rhys Piper – Director, Investigation Unit 1
:Dr Bradley Armstrong - Commissioner
From : Mr. Nguyen Trung Hieu – Vice General Director
Subject : MICCO Vietnam reply relating to Anti-dumping Notice No.2022/050

Dear Mr Rhys Piper ,
Dear Mr Bradley Armstrong,

We - Vinacomin Mining Chemical Industry Holding Corporation Limited (Micco) - are Vietnamese Exporter of Ammonium Nitrate, now under the investigation into the alleged dumping initiated on 08 June, 2022. We received your email and noted the content of your notice.

We have studied the exporter questionnaire and soon re-checked the process of exporting Ammonium Nitrate to Australia :

From 2019 until now, we have signed some Sales contracts with one trading company in China - J&E International (China) Co., Ltd (JE), for export Ammonium Nitrate with delivery term - FOB Hai Phong port, Vietnam. MICCO's price delivered to JE is FOB price at Hai Phong port, Vietnam, and the selling price to the Australian market has been decided by JE. The price that MICCO has been selling to JE from 2019 up to now is follow the international market price from time to time.

In details, during the investigation period from April 01st , 2021 to March 31st , 2022, MICCO exported one shipment of 6,480 Metric Tons of Ammonium Nitrate to JE with FOB price at Hai Phong port (suitable with market price at that time for JE to export to the Australian market).

However, currently MICCO is selling Ammonium Nitrate to JE company with price of over 1000 USD/ton FOB Hai Phong (high price due to limited supply from Russia and China at the time.)


So that from past to now, MICCO has been selling Ammonium Nitrate to JE at price that has been acceptable in the international market.



In addition, the amount of AN products of Vietnamese origin exported to Australia is very small compared to the volume consumed in the Australian market (accounting about 1.6%; For example, in year of 2021 MICCO exports 16,000 Metric Tons of Ammonium Nitrate, compared to the consumed quantity of Ammonium Nitrate in Australian market is above 1,000,000 tons of AN/year). We found that very small amount of MICCO's products can not make a significant influence on Australian Ammonium Nitrate manufacturing industry.

Therefore, we propose your Committee to stop the anti-dumping investigation on Ammonium Nitrate products with origin from MICCO and Vietnam. We are committed to sell Ammonium Nitrate at acceptable international market prices (in Australia, Southeast Asia,...).

Regarding answer to the question sent by the Commission, due to language limitations as well as our limitation of experience in this field (the first time MICCO has faced with this case), so that we will try to answer the questions within our knowledge level.

Looking forward to your understanding and hearing from you soon!
Thank you. 



Nguyen Trung Hieu
Vice General Director

