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31 January 2013

Mr John Bracic
Director, Operations 1
International Trade Remedies Branch
Australian Customs and Border Protection Service
Customs House
5 Constitution Avenue
CANBERRA ACT 2601

Dear Mr Bracic

Public File Copy

Review of variable factors – processed currants exported from Greece by Agricultural Co-Op Union Aeghion (Investigation No. 192) – Submission on behalf of Sunbeam Foods Pty Ltd

Background

I refer to the review investigation into exports of processed currants to Australia by Agricultural Co-Op Union Aeghion ("Aeghion") from Greece. The review inquiry follows an application by Frutex Australia Pty Limited ("Frutex") asserting that one or more of the applicable variable factors relevant to the exporter Aeghion may have changed.

Customs and Border Protection published Consideration Report No. 192 outlining its consideration that Frutex's application not be rejected.

Revocation

Sunbeam Foods Pty Ltd ("Sunbeam Foods") is the largest processor of currants in Australia and accounts for more than 50 per cent of total Australian production. Sunbeam Foods does not consider that the applicant has detailed grounds for the anti-dumping measures to be revoked. Sunbeam Foods considers that the anti-dumping measures applicable to processed currants exported from Greece are necessary to ensure that the injury that the measures were intended to prevent does not re-occur.

Greece remains the largest exporter of processed currants on the global market. In the absence of measures, injury from dumped Greek processed currants will likely re-occur.

Sunbeam Foods requests that the Minister not revoke anti-dumping measures on processed currants exported by Aeghion.

Unsuppressed Selling Price

In Investigation No. 140, Customs and Border Protection recommended that the Unsuppressed Selling Price ("USP") for the Australian industry be based upon the Sunbeam Foods' cost to make and sell ("CTM&S") which included an average price for dried currants received by growers based upon the 2004/05 crop.

In this review investigation into exports by Aeghion, Sunbeam Foods considers that the same methodology recommended by Customs and Border Protection in Report No. 140 based upon Sunbeam Foods' CTM&S for processed currants manufactured by the Company across the investigation period should apply, which includes prices paid to growers reflective of the 2011 and 2012 years (as the investigation period is spread across two seasons).

Sunbeam Foods does not consider it appropriate to determine a USP based upon selling prices during the investigation period as raw material currant prices have increased and Sunbeam Foods has been unable to recover these cost increases in its selling prices for processed currants (i.e. for industrial sales) due to the measures reflecting a USP determined on a lower (now superseded) cost base.

Customs and Border Protection has verified Sunbeam Foods' CTM&S financial data for the period 1 October 2011 to 30 September 2012. This verified information is appropriate for use in revised USP calculations, and reflects the increased prices to currant growers for the 2011 and 2012 years.

If you have any questions concerning the attached, please do not hesitate to contact me.

Yours sincerely



John O'Connor
Director

Cc: Mr Chris Ellis
General Manager Fruit Supply
Sunbeam Foods Pty Ltd