



4Farmers Submission

Australian Customs Dumping Notice #2012/54

Resumption of investigation into alleged dumping in respect of formulated glyphosate exported to Australia from the People's Republic of China

62% IPA salt cannot be considered a like good to the formulated goods consider in this investigation.

- Physically - 62% IPA salt and fully formulated Glyphosate both contain glyphosate, but that is where their similarity ends. The 62% requires further processing and blending of materials by a manufacture before it could be considered similar. An analogy is soft drink syrup would never be considered drinkable thus not physically the same unless it had critical materials added and blended.
- Commercial likeness – Only manufactures/suppliers who have the commercial know how and the means of a registered product to sell would consider purchasing 62% IPA salt to process. The same product is not purchased by end users because even if they had the expertise to manufacture the final product, the final product they produce would have no registration and would be prohibited to use on their own property let alone sell.
- Functional – There are no known registrations or recommendations that 62% can or might kill weeds like a fully formulated glyphosate product.
- Production – Production of 62% IPA salt can be an intermediate step to producing fully formulated glyphosate so of course the production of each will be the same to that extent. However this likeness would be as absurd as comparing flour to bread.

The other areas of the resumed investigation referring specifically to Rainbow and Good Harvest we cannot comment on.

Our general comment to the reviewers is we suggest the real motivation by Nufarm to call for this investigation is the frustration competing against suppliers who are importing inferior quality fully formulated glyphosate. These inferior imported glyphosates may have;

- Inferior wetting agents
- Low amount of wetting agents
- Active glyphosate amounts at the lower end of the allowable APVMA tolerances or even below.

These inferior glyphosates are generally not discernible to the end users and the regulatory authority responsible, the APVMA, does virtually nothing to correct any problems.

Therefore the facade is created that dumping is occurring.

## PUBLIC FILE

A duty on inferior quality glyphosates means good quality locally made glyphosates are relatively more competitive. However the duty will disadvantage importers importing perfectly legitimate quality product.

To establish there is a case for dumping requires comparison against domestically sold product in China. However the product sold in China is mostly 360g/l product normally only found as relatively high priced glyphosate in suburban hardware shops. 450g/l product or higher concentrations usually sold in Australia is relatively unheard of in China.

Even for what glyphosate product is sold in China, to extrapolate comparable Australian prices is extremely difficult. The direct comparison to 360g/l product is of course irrelevant and the comparison to more typical 450g/l product sold in Australia is fraught with risk because the quality of two glyphosate products may differ dramatically even though on the face of it they might appear similar to a casual observer.

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