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Mr Karl Brennan
Manager
Anti-dumping Policy Section
Department of Industry, Innovation and Science

via email: anti-dumping@industry.gov.au

Dear Mr Brennan

Anti-Dumping System Second Stage Policy Consultation

Australian Pork Limited (APL) welcomes the opportunity to provide further comments to the Department of Industry, Innovation and Science on proposed changes to Australia's anti-dumping system. This submission should be read in conjunction with APL's earlier submission, provided to the Department on 15 September 2017.

The Department has put forward a number of proposals to improve the operation and efficiency of the existing anti-dumping regime - at the margins. In doing so, the Department ignores or trivialises the concerns of Australian primary producers around the very foundations of the existing system.

Global trade competition has never been more complex. Newly emerging global trade powers that are unable or unwilling to be constrained by the current international trade rules bring unprecedented challenges to the system. At the same time, established trade powers are becoming ever more creative and brazen in their evasion of obligations to limit and report domestic support under WTO rules.

Against this backdrop, Australia's competitors around the world are looking not only to reinforce, but to completely overhaul their trading arrangements in light of international developments. It is disappointing that the Department has such a constrained view of Australia's anti-dumping system as to not even acknowledge the concerns raised by primary producers, such as APL, around fundamental defects and inadequacies in the current regime.

These defects put Australia out-of-step with global best practice, and expose Australian primary producers to predation by unscrupulous, state-supported competitors overseas.

APL is a strong supporter of free and fair trade, and of the WTO system. We urge the Department of Industry, Innovation and Science to review the fundamental underpinnings of Australia's anti-dumping regime, including the Customs Act, such that it better reflects contemporary trade developments and best practice, providing meaningful avenues of redress for primary producers.

Should you have any questions about this submission, please do not hesitate to contact Andrew Robertson on 02 62708888 or via email andrew.robertson@australianpork.com.au.

Yours sincerely



DEBORAH KERR
General Manager, Policy