

Australian Government Productivity Commission

By E-mail: tomato.safeguards@pc.gov.au

Attention: Carole Gardner / Stewart Turner

Your Ref:

Our Ref: M187/20131024

Date: 24 October 2013



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Dear Productivity Commission,

**SAFEGUARD INQUIRY INTO THE IMPORT OF PROCESSED TOMATO PRODUCTS
– SOUTH AFRICAN FRUIT AND VEGETABLE CANNERS' ASSOCIATION:
SUBMISSION ON ACCELERATED REPORT**

We refer to the abovementioned safeguard investigation and the Productivity Commission's Accelerated Report No 63. of 18 September 2013 (the "Accelerated Report"). We hereby submit our comments, on behalf of the South African Fruit and Vegetable Canners' Association, on the Accelerated Report as per requirements of the Productivity Commission.

1. Provisional measures

We have noted the Productivity Commission's finding and also recommend that the imposition of provisional safeguard measures would be unwarranted in the circumstances.

2. Productivity Commission Requirements

We agree with the application of the five general requirements which the Productivity Commission sets out on page 10 of the Accelerated Report. It is noted that some of these requirements require specific application which we have raised in previous submissions. We however do not agree that the Productivity Commission in its determination in this safeguards investigation, as indicated in the Accelerated Report, should be guided by the public interest in accordance with the Productivity Commission Act. We take note that safeguard investigation processes

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are conducted according to national legislation which must be in agreement with the WTO Agreements, in this instance the WTO Agreement on Safeguards.

The WTO Agreement on Safeguards is clear in so far as to the requirements that may be relied upon in safeguard investigations and determinations. Specifically in this context the investigation has to do with whether increased imports have caused serious injury to the *domestic industry*. It is thus the domestic industry which is relevant here and not the interests of the community as a whole. In this regard we refer the Productivity Commission to the WTO Appellate Body in US – Lamb (DS 177, 178) as referenced on the top of page 13 of the Accelerated Report.

3. Domestic Industry – SPCA accounts for major proportion

- 3.1. We note that the Productivity Commission determined that SPC-Ardmona (hereinafter “SPCA”) accounts for a major proportion of the domestic production of processed tomato products imported under the tariff subheading 2002.10.00 and statistical code 60 as well as the determined “directly competitive” product.
- 3.2. We agree with the Productivity Commission’s determination that SPCA therefore constitutes the domestic industry. We note that the Productivity Commission refers to the growers and that perhaps some consideration should be given to them. We submit that in terms of the WTO Agreement on Safeguards and WTO Jurisprudence¹ a different threshold applies namely, consideration should be given to the domestic industry. As the growers do not form part of the domestic industry, their alleged injury cannot be considered in the imposition of this safeguard investigation.

4. Have imports increased?

- 4.1. We support the Productivity Commission’s determination that the import statistics do not satisfy the requirement for ‘clear evidence’ of a sudden, sharp or significant increase in imports. We seek clarity whether these imports exclude the imports of the subject product by SPCA as elaborated on below in paragraph 4.3.
- 4.2. We support the caution with which the Productivity Commission interprets the ratio of imports to domestic production, especially given the variability listed in Box 2.2 of the Accelerated Report. We also seek clarity as to why SPCA did not provide the requested domestic production data for 2008.
- 4.3. We note that the Productivity Commission determined that there was an average increase of approximately 1.5 kilotonnes per year over the period July

¹ US – LAMB DS 177, 178).

2008 to June 2013. As mentioned in Box 2.2 of the Accelerated Report regard should be had to whether the average increase takes correct account of SPCA's own imports of foreign manufactured products. In this regard we annexe hereto Annexure A as proof of SPCA branded processed tomato products² which are made in Italy and the United States of America. We also seek clarity, preferably confidential, whether our confidential submission has been taken into account.

- 4.4. In this regard we submit that all of SPCA's imports regardless of origin, should be taken into account when determining the ratio of imports to domestic production as it will have a significant impact which will likely lead to a finding that the imports have not increased relative to production.
- 4.5. As such we submit that neither one of the thresholds as set out in Article 2.1 of the WTO Agreement on Safeguard have been met.

5. Was the increase in imports as a result of unforeseen developments?

- 5.1. We submit that the allegation of dumping should not be a relevant consideration in determining unforeseen developments in a safeguard investigation. We also submit that the supermarkets' private label strategy is not in fact unforeseen and SPCA in fact chose not to supply the retailers with a private label product. We submit that the appreciation of the Australian dollar was in fact foreseen.
- 5.2. We submit that the developments have not been unforeseen and that its combined effect cannot therefore be used to determine whether its combined effect was in fact foreseeable or not.

6. Is the domestic industry suffering injury?

6.1. SPCA's claims of serious injury

- 6.1.1. We note the claim that sales volume of domestically manufactured canned tomatoes fell from 2009 to 2012. We question whether this is indeed a true reflection of injury given the substantial imports of canned tomatoes by SPCA.
- 6.1.2. We note the methodology followed as detailed in Box 2.4 of the Accelerated Report. We seek clarity as to whether such aggregation and disaggregation in fact correctly accounts for SPCA labelled products which are in fact imported. We submit that if this is taken into account a different determination will be made in respect of the market share of imports.

² Imported under tariff subheading 2002.10.00 and statistical code 60

- 6.1.3. We note that SPCA claims a reduction in sales volume, sales value and SKU sold in the supermarkets. We note SPCA supported this data by providing confidential information which relates to "ex-factory sales of domestically produced goods". We seek clarity whether the Productivity Commission took into account the substantial imports of the subject product by SPCA.
- 6.1.4. We note the decrease in production levels which has been partly attributed to adverse weather conditions. We seek clarity whether the imports by SPCA has also been considered as contributing to such a decrease in production levels.
- 6.1.5. We support the Productivity Commission's determination that the reduction in profit margins was driven largely by an increase in expenses.

7. Injury conclusion

Given our comments above, we are of the opinion that the Productivity Commission should reconsider whether the domestic industry (SPCA) has in fact suffered injury and if such injury is suffered, whether such injury is in fact serious.

8. Have the imports caused the injury?

We support the determination made by the Productivity Commission that any alleged injury was caused by a combination of factors and that the questionable recent increase in imports relative to domestic production appears to be a symptom of the injury and not in fact the cause thereof.

9. Concluding remarks

- 9.1. Given that it seems doubtful whether there has in fact been any increase in imports that would meet the requirements of Article 2.1 of the WTO Agreement on Safeguards, we are of the opinion that safeguard measures cannot be imposed.
- 9.2. It would also seem as if the developments were in fact foreseen and as such safeguard measures should not be imposed.
- 9.3. As we seek clarity on whether the Productivity Commission has taken into account SPCA's own imports in analysis any injury, we question whether injury or in fact serious injury has been suffered.
- 9.4. In lieu of the determination that the alleged serious injury is not caused by the imports, we submit that safeguard measures cannot be imposed.

We thank the Government of Australia, the Productivity Commission in this regard for the opportunity to allow interested parties to submit comments on the Accelerated Report and we look forward to receiving your determination(s) in due course.

Yours faithfully

Rian Geldenhuys

Director

400g



Whole Tomatoes



P 510006 005014

To



400g

Goodness me, it's



CHEESY VEGETARIAN LASAGNE

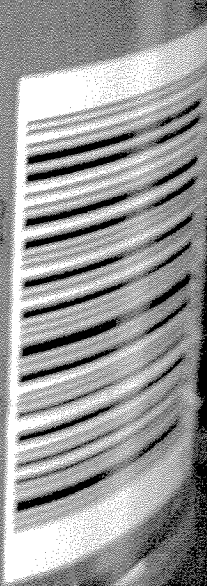
Method

1. Preheat oven to 180°C.
2. Drain SPC Whole Tomatoes, retaining 1 cup of juice. Cut each tomato in half. Cut all roasted vegetables into 5mm dice. Combine with tomatoes, basil, salt and pepper.
3. Line a greased 18 x 28cm deep baking dish with a layer of pasta, top with 1/3 vegetable mixture. Repeat with pasta, vegetables, pasta and remaining 1/3 of vegetables. Top with another layer of pasta and press down gently.
4. Combine ricotta, eggs and parmesan cheese. Spread over last pasta sheet. Top with grated cheese.
5. Bake for 45 minutes.

Serves 6

INGREDIENTS

TOMATOES (50%), TOMATO JUICE,
FOOD ACID (CITRIC ACID).
REFRIGERATE UNUSED CONTENTS IN A SEALED
NON-METALLIC CONTAINER, USE WITHIN 2 DAYS.
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SPC
Diced
Mato

SPC
Diced
Tomato

Tomato
Onion

Goodness me, it's



CHEESY VEGETARIAN LASAGNE

Method

1. Preheat oven to 180°C
2. Drain SPC Whole Tomatoes, retaining 1 cup of juice. Cut tomato in half. Cut all roasted vegetables into 5mm cubes, combine with tomatoes, basil, salt and pepper.
3. Line a greased 18 x 28cm deep baking dish with a layer of pasta, top with $\frac{1}{3}$ vegetable mixture. Repeat with pasta, vegetables, pasta and remaining $\frac{1}{3}$ of vegetable mixture. Add another layer of pasta and press down gently.
4. Combine ricotta, eggs and parmesan cheese. Spread over last pasta sheet. Top with grated cheese.
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MADE IN ITALY

NUTRITIONAL INFORMATION

PER 100g	PER 100g
ENERGY	155g
PROTEIN	2.2g
FAT	0.1g
CARBOHYDRATE	1.2g
FIBRE	0.1g
SODIUM	0.1g
IRON	0.1g
VITAMIN C	0.1g
VITAMIN E	0.1g
VITAMIN K	0.1g
VITAMIN B1	0.1g
VITAMIN B2	0.1g
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INGREDIENTS:

TOMATOES (60%), TOMATO JUICE,
FOOD ACID (CITRIC ACID).

REFRIGERATE UNUSED CONTENTS IN A SEALED
NON METALLIC CONTAINER. USE WITHIN 2 DAYS.

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ANDREW FAIRLEY AVENUE,

SHEPPARTON, VICTORIA, 3630, AUSTRALIA

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"GOODNESS ME, IT'S SPC" IS A TRADE MARK
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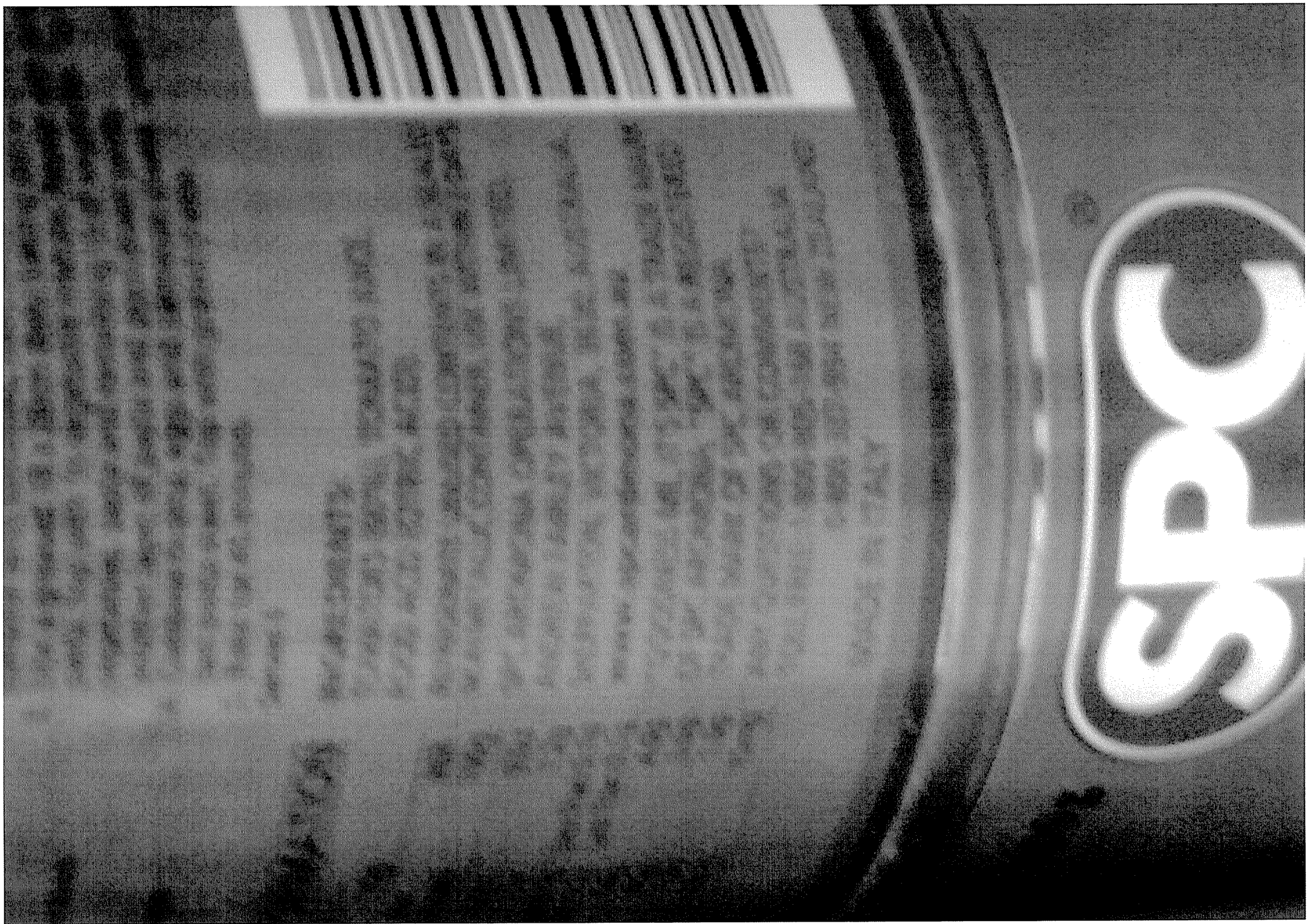
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MADE IN ITALY

SPC



The SPC logo, consisting of the letters 'SPC' in a bold, sans-serif font, enclosed within an oval border.

470

100-443887-100

NON INFORMATION

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