

CONCEPT ALUMINIUM & COATINGS P/L
22-26 ONSLOW AVENUE, CAMPBELLFIELD
9357 2888 9357 4355

12 May 2015

Re: Anti-dumping Exemption

Attention Commissioner
C/O Anti-Dumping Commission.

Dear Commissioner ,

My name is John Makris and I am managing director of the above said company. Upon enquiring with the anti-dumping commission I am hereby claiming an anti-dumping exemption for our proposed shipment of a light gauge extruded flyscreen profile from China.

The exemption falls within *

Exemption One – Like or directly competitive goods are not offered for sale in Australia to all purchasers on equal terms under like conditions having regard to the custom and usage of trade.

Under the definition of the anti dumping notice No 2015/48 description it states that anti dumping will apply to extrusions that have a wall thickness of 0.5mm , with a maximum weight of 27kg and a profile cross-section which fits into a circle diameter of 421mm .

The extrusion I am purchasing have a wall thickness of 0.6mm .

It is my understanding and I have documents to support , that no Australian Extrusion press can produce and extrusion of 0.6mm. It is a slow process and our labour costs don't justify doing so. Therefore we have no choice but to purchase this product from overseas.

I have attached my supporting documentations from 2 extrusion companies. One being AluShape Extrusions and the other Extrusions Australia. The closest 0.9mm and this is the thinnest that can be produced in Australia.

Your prompt reply and understanding on this issue would be greatly appreciated.

Kind Regards



John Makris

Information provided by email 26/5/15

1. Importers Pioneer Trading Company
79 Northview Drive
Sunshine
Phone 9312 6218 Fax 9312 6329
- Aluminium Specialties Group
26-40 Pound Road
Dandenong South
Phone 8787 6333 Fax 8787 6399
- Darley Aluminium
10 BRIDGE ROAD
Dandenong South
Phone 9702 3266 Fax 9702 4111
- Exporters NOT APPLICABLE
- End Users Parkside Screens
Nick 0407 526 770
- MTM Windows
Martin 9310 5544
- Imperial Windows
Omer 9749 7115
- Direct Windows
Goran 9408 7322

** If more required , please let me know.

2. Tariff classification – I am not sure what this relates to ??

* Countries - Malayasia
Company Classic Emas (Sarawak)
LOT 1546, BLOCK 8, MTLD
93050 KUCHING, SARAWAK, MALAYSIA
Phone 001160 82433199

3. Additional information supplied is a die drawing. Even though it may look like a small amount the fact that this profile has a wall thickness of 0.60mm means it cannot be produced in Australia. This die needs to run very slowly out of the extrusion press, and our high labour costs cannot justify running this profile. This is why we need to import from overseas.

Other extruders such as Capral , Alspec and G.James can also verify this to be the case. To my understanding also import this product from overseas . To substitute a wall thickness of 0.90mm is not an option. Additional to the wall thickness of 0.60mm the profile also gets run through a “bowing Machine “ giving it a bow of about 40mm in the centre. The thicker the

metal the less likelihood of the profile to have that spring effect which you need to keep the flymesh tight.
Also the cost would increase dramatically , placing it out of reach of the market.

John Makris
Managing Director

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Information provided by email 28/5/15

These two diagrams are the two section we require the exemption.

If you look closely at the drawings on both of these profiles it highlights the “wall thickness “ roughly in the middle of the drawings above where it reads SCALE. Of a wall thickness of 0.60mm.

- i) Physical likeness; The exemption is sought purely on its wall thickness. As described in my earlier emails. This wall thickness cannot and is not produced in Australia to my knowledge.
- ii) Commercial likeness. There is not a identical likeness to this extrusion which falls under the category of an extruded flyscreen.
- iii) Functional Likeness/Product likeness. There may be other companies offering flyscreen profile on the market , however its wall thickness is way to thick and does not perform anywhere near as good as ours as it does not pertain the correct bow or flexibility of the one we are using.
- iv) The purpose of the flyscreen frame is to hold in place a fibreglass mesh which is positioned onto an aluminium frame sealing off the sash , preventing flies and mosquitos and other bugs from entering a home or commercial building. The bow gives the profile flexibility maintaining a tight tension on the screen. Main uses are domestic homes and commercial apartments.
- v) The flyscreen is not new in the market. Traditionally flyscreens we “rolled” into shape , however labour cost prevent this in today market.
- vi) The flyscreen to my knowledge may be produced slightly thicker that 0.60mm but not by much. Having got in contact with ALSPEC another aluminium distributor there flyscreen is 0.75mm . However it does not perform as well as ours.
- vii) We are only seeking to import these two extrusions with a wall thickness of 0.60mm . 90% of all our aluminium extrusions are produced here in Australia , however there wall thicknesses vary form 1.2 – 3.0mm . It is only that no Australian press produced this flyscreen frame that we are forced to import from overseas.

Kind regards

John Makris | Concept Aluminium | 22 - 26 Onslow avenue Campbellfield 3061 Vic
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Information provided by email 8/7/15

These are the only two extrusions we require an exemption on.

- *They are both 5000mm in length and have a bow of approximately 40mm in the centre.
- * They both have an unspecified wall thickness of 0.60mm.
- * one is 25mm x 11mm in height and width
- * one is 22mm x 9mm in height and width.
- * they both weigh approximately 0.58 kg. Per length

And most importantly cannot be produced in Australia. Hence the need to import.