

**Application for an anti-circumvention inquiry into
avoidance of the intended effect of duty**

**Aluminium extrusions exported from
China by PanAsia Aluminium (China) Limited**

NON-CONFIDENTIAL VERSION

19 March 2014

Declaration

In accordance with subsection 269ZDBC(1A) of the *Customs Act 1901* (Act), I request that the Anti-Dumping Commissioner conduct an anti-circumvention inquiry in relation to notices published under subsections 269TG(2) and 269TJ(2) of the Act, in respect of certain aluminium extrusions exported from the People's Republic of China (China).

I consider that there are reasonable grounds to assert that circumvention activity has occurred that is avoiding the intended effect of duty.

This application is made by a person representing, or representing a portion of, the Australian industry producing like goods, which considers that the circumvention activity in relation to the notice has occurred.

I consider that it may be appropriate to alter the notice because of the circumvention activity.

I confirm that:

- This application does not describe any other kind of circumvention activity in relation to the notice detailed above; and
- I have not made an application, which has resulted in an anti-circumvention inquiry into avoidance of the intended effect of duty, in respect of the notice detailed above, within the previous 12-month period from the date of this application.

I believe that the information contained in this application:

- provides reasonable grounds for the conduct of an anti-circumvention inquiry; and
- is complete and correct to the best of my knowledge and belief.

Signature	[see confidential version]		
Name	Tony Dragicevich		
Position	CEO and Managing Director		
Company	Capral Limited		
ABN	78 004 213 692	Date	18 / 03 / 2014

Required information

1. Applicant

Provide details of the name, street and postal address, of the applicant seeking the inquiry.

Name	Capral Limited
Address	Level 4, 60 Phillip Street Parramatta NSW 2150
ABN	78 004 213 692

2. Contact persons

Provide details of the name of a contact person, including their position, telephone number and facsimile number, and e-mail address.

Capral has appointed a representative to assist with the application and inquiry. All correspondence should be directed to our representative in the first instance.

Capral contact

Name	Andrew Barlow
Position	Group Commercial Manager
Telephone	(02) 9682 0967 m 0404 818 264
Facsimile	(02) 9682 0777
E-mail	Andrew.Barlow@capral.com.au

Capral's representative

Name	Justin Wickes
Business	Wickes & Associates Pty Ltd
Address	PO Box 922 Gungahlin ACT 2912
Telephone	0438 700 570
E-mail	justin@wickes.com.au

3. Other interested parties

Provide known names, addresses, telephone and facsimile numbers of other parties likely to have an interest in this matter, e.g., Australian manufacturers, importers, exporters and end users.

The aluminium extrusions industry comprises a large number of parties. In the original investigation Customs identified 306 importers and 311 possible Chinese exporters. This application directly impacts only one known exporter and two known importers. The Commission may discover other parties involved in circumvention activity during the course of its investigation. Other members of the Australian industry may have additional information about this circumvention activity in the Australian market.

Exporter

Company	Address	Phone/Fax
PanAsia Aluminium (China) Limited	Tangerine Garden Guangshan Road Licheng Town, Zengcheng City Guangdong Province People's Republic of China http://www.palum.com	Phone: +852 2972-2028 Fax: +852 2972-2309

Importers

This application is made against the importers Oceanic Aluminium and P&O Aluminium. P&O Aluminium is the larger of the two and actually comprises four separate companies. PanAsia states that Oceanic and P&O share common ownership and refers to them collectively as the 'P&O Companies'.¹

Company/ABN	Address	Phone/Fax
Oceanic Aluminium Pty Ltd ABN: 74 121 335 635	Unit 43, Slough Business Park 2 Slough Avenue Silverwater NSW 2128 http://www.oceanicalum.com.au	Phone: 02 9648 5266 Fax: 02 9648 0770
P&O Aluminium (Brisbane) Pty Ltd ABN: 52 103 434 920	56 Depot Street Banyo QLD 4014 http://www.pandoalum.com.au	Phone: 07 3266 7400 Fax: 07 3266 7500
P&O Aluminium (Melbourne) Pty Ltd ABN: 63 098 978 922	55-59 Hallam Valley Road Dandenong South VIC 3175	Phone: 03 9708 5920 Fax: 03 9708 5930
P&O Aluminium (Perth) Pty Ltd ABN: 85 133 225 680	1/48 Canvale Road Canning Vale Road WA 6155	Phone: 08 9455 3800 Fax: 08 9456 5066
P&O Aluminium (Sydney) Pty Ltd ABN: 95 080 757 688	2/15 Bennett Street Chester Hill NSW 2162	Phone: 02 9724 1568 Fax: 02 9724 5722

¹ PanAsia global share offering at Attachment A.3, p.5

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Australian industry

Company	Address	Phone/Fax
Almax Aluminium Pty Ltd	87 Trade Street Lytton QLD 4178 http://www.almax.net.au	P: 07 3906 6000 F: 07 3906 6066
Aluminium Profiles Australia Pty Ltd (APA)	25-31 Licola Crescent Dandenong South VIC 3175 http://www.aluminiumprofiles.com.au	P: 03 9768 5000 F: 03 9768 5050
Aluminium Shapemakers Pty Ltd (AluShapes)	7 Warringah Close Somersby Industrial Park Somersby NSW 2250 http://www.alushapes.com.au	P: 02 4340 4344 F: 02 4340 4348
Extrusions Australia Pty Ltd	25-28 Andretti Court Truganina VIC 3026 http://www.extrusions.com.au	P: 03 8348 9300 F: 03 8348 9301
G James Extrusion Co Pty Ltd	1082 Kingsford Smith Drive Eagle Farm QLD 4009 http://gjames.com	P: 07 3877 2833 F: 07 3877 2890
Independent Extrusions Pty Ltd (Inex)	33-39 Licola Crescent Dandenong South VIC 3175 http://www.inex.co.nz	P: 03 9768 0000 F: 03 9768 2748
Olympic Aluminium Co Pty Ltd	606 Ballarat Road Sunshine VIC 3020 http://www.olympicaluminium.com	P: 03 8361 2122 F: 03 9363 6643
Ullrich Aluminium Pty Ltd	20 Ron Boyle Crescent Carole Park QLD 4300 http://www.ullrich.com.au	P: 07 3718 1400 F: 07 3271 1230

End users

There are a large number of end-users of aluminium extrusions as identified in the original investigation. The end-users relied upon for the purposes of this application are named in the list of confidential attachments.

4. Goods description

Provide a description of the kind of goods that are the subject of the original notice.

The notices describe the goods as “certain aluminium extrusions (the goods), classified to tariff subheading 7604.00.00, 7608.00.00 and 7610.00.00 in Schedule 3 of the *Customs Tariff Act 1995* exported to Australia from the People’s Republic of China”.²

² Notices made under s.269TG(1)/(2) and s.269TJ(1)/(2) of the *Customs Act 1901* and signed by the Attorney –General on 21 October 2010, published in Trade Measures Report No. 148, pp.2-5

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The notices refer to Trade Measures Report No. 148 (REP 148), which further states that the goods are:

Aluminium extrusions produced via an extrusion process, of alloys having metallic elements falling within the alloy designations published by The Aluminum Association commencing with 1, 2, 3, 5, 6 or 7 (or proprietary or other certifying body equivalents), with the finish being as extruded (mill), mechanical, anodized or painted or otherwise coated, whether or not worked, having a wall thickness or diameter greater than 0.5 mm., with a maximum weight per metre of 27 kilograms and a profile or cross-section which fits within a circle having a diameter of 421 mm.³

5. Notice description

Provide a description of the original notice, including:

- *whether the notice was a dumping and/or countervailing notice;*
- *the tariff classification/s of the goods;*
- *the countries and/or exporters covered by the notice; and*
- *the date of publication of the notice.*

This application covers two notices:

- a dumping duty notice under s.269TG(1) and (2), and
- a countervailing duty notice under s.269TJ(1) and (2).

Both notices were published on 28 October 2010 and cover all exporters of aluminium extrusions from China except Tai Ao Aluminium Tai Shan Co. Ltd.

The specific tariff classifications to which the notices apply are listed in REP 148 and are as follows:

Reference Number	Stat Code	Goods
7604.10.00	06	Non-alloyed aluminium bars, rods and profiles
7604.21.00	07	Alloyed aluminium hollow profiles—Angles, other shapes and sections
7604.21.00	08	Alloyed aluminium hollow profiles—Other
7604.29.00	09	Alloyed aluminium non-hollow profiles—Angles, other shapes and sections
7604.29.00	10	Alloyed aluminium non-hollow profiles—Other
7608.10.00	09	Non-alloyed aluminium tubes and pipes
7608.20.00	10	Alloyed aluminium tubes and pipes
7610.10.00	12	Aluminium doors, windows and their frames and thresholds for doors
7610.90.00	13	Aluminium plates, rods, profiles, tubes and the like prepared for use in structures; and other aluminium structures and parts of structures

³ REP 148, p.18

6. Circumvention activity

Provide a detailed statement regarding the circumvention activity that you consider that has occurred and which is resulting in avoidance of the intended effect of duty in relation to the original notice. You must provide evidence to support your view that there are reasonable grounds for asserting that the circumvention activity has occurred that is avoiding the intended effect of duty in relation to the notice.

Measures in the form of dumping and countervailing duties were imposed on exports of aluminium extrusions from China in October 2010. Exports from China to Australia have continued in significant volume despite the imposition of dumping and countervailing duties. PanAsia is the largest exporter of extrusions to Australia and estimates that it accounts for around half of all exports to Australia.⁴ PanAsia maintained its market share and recorded revenue growth in Australia in 2013 despite the recent depreciation of the Australian Dollar (AUD).⁵

P&O and Oceanic are the two largest customers of PanAsia, accounting for around 80% of its revenue from exports to Australia.⁶ At the time of the original investigation P&O and Oceanic were subsidiaries of PanAsia, however during 2009 PanAsia disposed of its interests in these companies and it reports that P&O and Oceanic are now both owned by the same 'independent third party'.⁷ As a result P&O and Oceanic are no longer bound to purchase exclusively from PanAsia, but the two companies have chosen to continue purchasing from PanAsia, and PanAsia's sales to them have in fact increased.⁸

Despite their alleged independence, we claim that P&O and Oceanic are circumventing the intended effect of the dumping and countervailing duties by failing to recover the full cost of the extrusions, including the duties, and are continuing to cause injury to the Australian industry.

To support our claim we have estimated export prices, duties, post-exportation charges and importer costs and profit to calculate the price that should have been seen in the market following the imposition of measures (the target price). We have compared the target price to actual/estimated prices offered by P&O and Oceanic, which show that they have failed to increase the price commensurate with the total amount of duty payable and are effectively making sales at a loss. In fact there is evidence that P&O has *reduced* prices to some customers since the measures were imposed in order to maintain sales volume.⁹ This practice clearly undermines the purpose of the duties, which is to prevent further injury to Australian manufacturers.

⁴ PanAsia global share offering at Attachment A.3, p.2

⁵ PanAsia 2013 annual results at Attachment A.4, p.21

⁶ PanAsia global share offering at Attachment A.3, p.173

⁷ *ibid.*, pp.119-120

⁸ *ibid.*, p.120

⁹ Comments at Confidential Attachment B.8 refer

Export price

Export prices for PanAsia were established during the original investigation and have not been reviewed since that time. Separate export prices were determined for aluminium extrusions of different finishes—being mill, powder coated and anodised—which recognised the significant additional cost of finishing that was reflected in the prices for powder coated and anodised extrusions. However, when measures were initially imposed, duties were based on a single ascertained export price (AEP) and duty rate.

When Customs reinvestigated the matter (following review by the Trade Measures Review Officer) it changed the measures and imposed duties by finish. Customs stated:

Where there are distinct subcategories of the goods with different variable factors, the reinvestigation considers it reasonable and appropriate to impose measures by the distinct subcategories. This is to ensure that measures are effective in providing relief from the effects of dumping and subsidisation across the category of the goods.¹⁰

In 2013 the Federal Court effectively ruled that the legislation does not allow separate measures to be imposed for different subcategories of goods and the measures applicable to PanAsia reverted to those initially imposed.¹¹ As a result, a single AEP applies to all of PanAsia's exports to Australia, regardless of finish. In theory this AEP should be based on a weighted average of exports of all finishes, however we understand that it is actually based on exports of mill finish only.

We are not aware of PanAsia's AEP due to confidentiality restrictions. However, we are aware of the current AEPs applicable to residual exporters, for whom there is still a separate AEP for each finish.¹² We understand that these AEPs are based on the information of cooperating exporters, of which PanAsia is one of three, and the Commission has previously advised us that the original AEP (before the measures were broken out by finish) was the same for all exporters.¹³

Based on the above it is reasonable to assume that the AEP for PanAsia is similar to the current AEP for mill finish extrusions applicable to residual exporters, and we have used this in our calculations.

Credit terms adjustment

The AEP used above is quoted on cash terms, however PanAsia has stated that it grants P&O and Oceanic a credit period of 90 days.¹⁴ An upward adjustment to the cash price is therefore required to bring it into line with the terms actually given by PanAsia to P&O and Oceanic. PanAsia reported that the effective interest rate of its bank

¹⁰ International Trade Remedies Branch, Report No. 175, 15 August 2011, p.37 at 9.4

¹¹ Anti-Dumping Notice No. 2013/80

¹² Extract from Customs Confidential Instructions at Confidential Attachment B.2

¹³ Email from the Commission to Capral's representative dated 18 September 2013 at Confidential Attachment B.3

¹⁴ PanAsia global share offering, p.123

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borrowings for the financial year ending 30 September 2012 (the most recent period available) was 5.6%,¹⁵ therefore we have used this rate in our calculations.

Dumping and countervailing duties

Dumping duties comprise a fixed and variable component of duty. Countervailing duties are a fixed duty. Following its reinvestigation of this decision Customs published the combined dumping and countervailing duty rates for the fixed component of duty. We understand that as a result of the recent Federal Court findings in relation to this decision PanAsia's combined duty rate for all finishes is now 10.1%¹⁶ and we have used this as the rate for the fixed component of combined dumping and countervailing duty in our calculations.

The variable component of duty is dictated by the AEP. As we have used the AEP as the starting point for building the target price, such an import would not attract a variable component of duty and we have not included any in our calculations.

Post-exportation charges

The AEP used in our calculations is a free on board (FOB) price. Costs to get the goods to the importer from China include:

- shipping and insurance
- customs duty
- port and handling charges
- customs and quarantine cost recovery charges, and
- brokerage fees.

The customs duty applicable to the majority of extrusions imported from China is 4%. We have estimated the remaining costs based on [REDACTED].¹⁷ The estimated cost of shipping and insurance is AUD [REDACTED] per kg and other import charges is AUD [REDACTED] per kg.

Importer expenses and profit

Both P&O and Oceanic operate warehousing and distribution services for imported extrusions. The importer visit report for the PanAsia Australian companies during the original investigation details the functions performed by the importers:

- Sales
- Marketing
- Warehousing
- Distribution
- Inventory/purchases
- Accounting

¹⁵ *ibid.*, p.206

¹⁶ Anti-Dumping Notice No. 2013/80

¹⁷ Post-exportation charges at Confidential Attachment B.4; calculations at Confidential Attachment B.1

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We understand that these businesses operate in the same manner in the Australian market subsequent to their sale by PanAsia, therefore it is reasonable to assume that P&O and Oceanic continue to perform the same functions. We have estimated importer selling, general and administrative expenses (SG&A) for P&O based on the 2008 audited accounts for PanAsia Group Pty Ltd, which was when PanAsia owned its Australian import business and is the most recent period for which data is available.¹⁸ We have estimated the SG&A for Oceanic based on the 2008 audited accounts for Oceanic Aluminium Pty Ltd, being the most recent period for which data is available.¹⁹ The estimated SG&A is AUD [REDACTED] per kg for P&O and AUD [REDACTED] per kg for Oceanic.²⁰

The import and sale of aluminium extrusions is the core business of P&O and Oceanic, which are claimed to now be solely independent of PanAsia. It is therefore reasonable to expect that these businesses make a profit from the sale of Chinese extrusions in Australia. We also note from the importer visit report during the original investigation that these sales were profitable even when the importers were subsidiaries of PanAsia. We believe the target profit for an importer to sustain its business is *at least* 5% in order to provide a reasonable return on investment to shareholders.

Target price

We have calculated the target price as the sum of:

- Ascertained export prices for mill, powder coated and anodised extrusions
- Credit terms adjustment of 90 days at 5.6%
- Customs duty of 4%
- Dumping duty of 10.1%
- Shipping and insurance of \$ [REDACTED] per kg
- Import charges of \$ [REDACTED] per kg
- Importer SG&A of \$ [REDACTED] or \$ [REDACTED] per kg, and
- Importer profit of 5%.²¹

The estimated target price is AUD [REDACTED] per kg for P&O and AUD [REDACTED] per kg for Oceanic.

Actual/estimated prices

We have obtained evidence of prices offered by P&O and Oceanic to its customers and actual purchases [REDACTED].²² The weighted average of the actual/estimated prices (across all finishes) is AUD [REDACTED] per kg for P&O and AUD [REDACTED] per kg for Oceanic.

¹⁸ PanAsia Group Pty Ltd financial statements at Attachment A.1

¹⁹ Oceanic Aluminium Pty Ltd financial statements at Attachment A.2

²⁰ Calculations at Confidential Attachment B.1

²¹ Calculations at Confidential Attachment B.1

²² Evidence of pricing at Confidential Attachments B.5 to B.15

Price comparison

A comparison of P&O and Oceanic's weighted average actual/estimated price to the target price shows the importers making significant losses on sales.²³ These losses in terms of both dollars per kg and as a percentage of the target price are as follows:

Importer	Loss on sales (AUD per kg)	Loss on sales (% below target price)
P&O	\$ [REDACTED]	[REDACTED]%
Oceanic	\$ [REDACTED]	[REDACTED]%

This level of price undercutting continues to have a significant injurious effect on the Australian industry.

The customers for which we have provided estimates of P&O and Oceanic's pricing represent a significant proportion of PanAsia's exports to Australia. We estimate that our price comparison analysis covers greater than 50% of PanAsia's annual export volume to Australia of goods subject to duties.²⁴ It is highly unlikely that sales of the remaining volume are sufficiently high enough in price to offset the losses we have estimated. Given the claim that P&O and Oceanic are no longer related to PanAsia, there appears to be no commercially sound reason for making these losses and the matter clearly warrants investigation.

P&O and Oceanic may argue that they are profitable overall, with profits on sales of goods not subject to duties more than offsetting losses made on aluminium extrusions. However, we submit that profits made elsewhere are irrelevant to determining whether an importer has circumvented the intended effect of dumping and countervailing duties applicable to particular goods. The Minister found that the sale of dumped Chinese aluminium extrusions caused injury to the Australian industry and imposed duties to remove that injury, however the injury continues because prices from P&O and Oceanic did not increase as expected following the imposition of duties. If an importer can simply absorb duties and offset the cost by making profits on sales of other goods that do not compete with like goods produced by Australian industry, then no dumping or countervailing duties are ever likely to be effective.

PanAsia may argue that the normal value has changed since the original investigation, however we note that PanAsia has not applied for a review of normal value in the three years since measures were imposed, and neither P&O nor Oceanic have ever applied for a duty assessment in that time. Regardless, the normal value is irrelevant to determining whether P&O and Oceanic have circumvented the intended effect of the duties as alleged in this application.

²³ Calculations at Confidential Attachment B.1

²⁴ Calculations at Confidential Attachment B.1

Compliance issues

We note that the goods covered by the notices include aluminium extrusion products that have been further processed or fabricated, eg. precision cut, machined, punched or drilled.²⁵ PanAsia claims that it has responded to the imposition of duties on aluminium extrusions by increasing its exports of ready-for-sale and semi-finished goods that are not subject to duties.²⁶ PanAsia's revenue from sales of semi-finished goods to Australia has increased since measures were imposed.²⁷

We are concerned that so-called semi-finished goods may not actually be excluded from the goods definition outlined in REP 148 and Trade Measures Issues Paper 2009/148. As part of this inquiry we request the Commission thoroughly investigate all imports of aluminium products by P&O and Oceanic to determine whether they were correctly classified as subject to or not subject to dumping and countervailing duties.

We are confident that all of the examples we have provided for the purposes of the price comparison above are for goods covered by the notices. However, it is important to understand, for all imports of extruded aluminium products, the:

- country of origin
- aluminium alloy used
- profile size
- type of finish
- level of fabrication or further processing.

This may appear difficult in the absence of physical inspection of the goods, however many of these factors can be verified based on an understanding of the application and end-use to which the goods are put. For example, a customer who manufactures windows and powder coats its products in-house, will generally only purchase certain types of mill finish extrusions, which are clearly goods covered by the notices.

We suggest that it would be useful for an independent expert in the aluminium extrusion industry and market to assist the Commission in verifying the classification and declaration of aluminium extrusion products.

7. Notice alterations

Provide a description of the alterations to the original notice that you consider should be made.

Prices offered by P&O and Oceanic in the marketplace do not reflect prices that should be seen commensurate with the level of dumping and countervailing duties that were imposed. The notices therefore must be altered to ensure that reasonable prices are seen in the future. We believe the best way to do this is to reascertain the export price

²⁵ REP 148, p.18 at 3.2

²⁶ PanAsia global share offering, p.173

²⁷ *ibid.*, p.174

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using the deductive method, starting with P&O and Oceanic's prices to their customers and deducting all import costs and an amount for importer profit.

Comparing the reascertained export price to the original AEP will identify the amount by which the importers are circumventing the intended effect of the duties. This amount can then be added to the existing fixed amount of dumping duty to remedy the current level of circumvention.

As noted earlier, we understand that PanAsia's AEP is based on the price of mill finish extrusions only. It is clear from last year's Federal Court decision that a single AEP should be the weighted average of goods covered by the dumping or countervailing duty notice and we understand that this has been the approach taken in subsequent reviews.²⁸ We therefore submit that the reascertained export price for PanAsia should be based on the weighted average for all finishes.

We have used the deductive method and the costs and prices outlined above to estimate the reascertained export price and revised amount of fixed dumping and countervailing duty for PanAsia's exports.²⁹ As a starting point we have used the weighted average of the actual/estimated selling prices described earlier, however we acknowledge that P&O's average selling price is likely to be somewhat higher once sales to smaller customers and sales of products that attract a surcharge are taken into account (eg, certain alloys and complex profiles may incur surcharges). We have therefore uplifted the average selling price to take account of these surcharges and we estimate that AUD [REDACTED] per kg is a reasonable uplift based on Capral's experience in the market. We have then deducted importer profit, costs and duties to arrive at a reascertained FOB export price.

As a result we propose alterations to the notices as follows:

- Reascertained export price of AUD [REDACTED] per kg, and
- Fixed amount of dumping duty of AUD [REDACTED] per kg, up from AUD [REDACTED] per kg.

We also note that the legislation permits the Minister to make alterations to the notice effective from the date the anti-circumvention inquiry commenced. We strongly urge the Minister to exercise his discretion to make any increase in duties applicable from this date. This circumvention activity has been occurring for over three years since the measures were imposed and the industry has had to wait until this legislation came into effect in order to take action.

²⁸ Anti-Dumping Commission Report No. 214, 23 September 2013, p.15 at 3.4

²⁹ Calculations at Confidential Attachment B.1

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8. List of attachments

Non-confidential: suitable for public record

No.	Description
A.1	PanAsia Group Pty Ltd financial statements for the year ended 31 December 2008
A.2	Oceanic Aluminium Pty Ltd financial statements for the period 1 July 2007 to 31 December 2008
A.3	Extract from PanAsialum Holdings Co Ltd global share offering, 23 January 2013 (full document is 422 pages)
A.4	PanAsialum Holdings Co Ltd announcement of annual results for the year ended 30 September 2013

Confidential: for official use only

No.	Description
B.1	Spreadsheet of all the workings and calculations to support this application
B.2	Extract from Customs Confidential Instructions for the dumping and countervailing duties on aluminium extrusions exported from China
B.3	Email from the Commission to Capral's representative dated 18 September 2013 concerning the dumping and countervailing duties on aluminium extrusions exported from China
B.4	Evidence of post-exportation charges
B.5	██████████ – Evidence of pricing to ██████████
B.6	██████████ – Evidence of pricing to ██████████
B.7	██████████ – Evidence of pricing to ██████████
B.8	██████████ – Evidence of pricing to ██████████
B.9	██████████ – Evidence of pricing to ██████████
B.10	██████████ – Evidence of pricing to ██████████
B.11	██████████ – Evidence of pricing to ██████████
B.12	██████████ – Evidence of pricing to ██████████ and ██████████
B.13	██████████ – Evidence of pricing to ██████████
B.14	██████████ – Evidence of pricing to: ██████████ ██████████ ██████████
B.15	██████████ – Evidence of pricing to ██████████ and ██████████