

8 May 2018

The Director  
Investigations 2  
Anti-Dumping Commission  
Level 35  
55 Collins Street  
Melbourne Victoria 3000

Email: [investigations2@adcommission.gov.au](mailto:investigations2@adcommission.gov.au)

### Public File Version

Dear Sir/Madam

#### **Investigation No. 475 – Accelerated review investigation - aluminium extrusions exported from P R China by Anhui Tongxi Jinpeng Aluminium Co., Ltd**

I refer to Accelerated Review Investigation No. 475 concerning exports to Australia by Anhui Tongxi Jinpeng Aluminium Co., Ltd “Anhui Tongxi”. Anti-Dumping Notice No. 2018/58 published on 18 April 2018 announced the commencement of the accelerated review. The notice called for submissions from interested parties by 10 May 2018.

Capral Limited (“Capral”) anticipates that the Anti-Dumping Commission (“the Commission”) will establish whether the applicant Anhui Tongxi in fact is eligible to be considered a new exporter in accordance with subsection 269T(1).

Capral takes this opportunity to draw to the attention of the Commission that as Anhui Tongxi is a Chinese exporter, normal values for the exporter will be determined under subsection 269TAC(2)(c) on a constructed cost basis using the verified costs of the exporter, with a market price for aluminium included in Anhui Tongxi’s normal value. As a minimum, Anhui Tongxi’s surrogated aluminium cost should reflect the following elements calculated for the investigation period:

- Aluminium at the London Metal Exchange (“LME”) rate; plus
- Billet premiums; plus
- Major Japanese Port (“MJP”) premium (applicable to all aluminium purchases in South East Asia).

The surrogate aluminium cost (including the identified components listed above) is required to be included in the applicant exporter’s production costs. In addition to these costs, the Commission is required to determine selling and general administration expenses and an amount for profit to be included in Anhui Tongxi’s normal value.

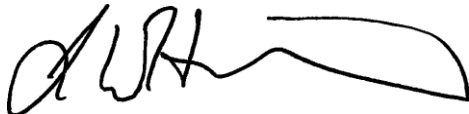
Capral would also anticipate that the Commission would include upward adjustments for packing costs associated with Anhui Tongxi’s export sales of the goods to Australia, including: steel trolleys, wooden crates and inter leave paper.

Capral has obtained information concerning Anhui Tongxi's [financial information] – please refer to Confidential Attachment 1. It is also noted that Anhui Tongxi is located in the Economic Development Zone of Guzhen County, Bengbu, Anhui Province. Capral understands that entities located in Economic Development Zone [benefits].

Capral requests that the Commission fully establish the extent of Government of China benefits that flows to the applicant exporter Anhui Tongxi.

If you have any questions concerning this submission, please do not hesitate to contact me on (02) 8222 0113 or Capral's representative Mr John O'Connor on (07) 3342 1921.

Yours sincerely

A handwritten signature in black ink, appearing to read 'LHAWKINS', with a long horizontal flourish extending to the right.

Luke Hawkins  
General Manager – Supply and Industrial Solutions