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Review 304: Response to initiation of review

This submission is made by Capral Limited, a member of the Australian aluminium extrusion industry, in relation to Review 304 concerning the review of anti-dumping measures on aluminium extrusions exported to Australia from China by Press Metal International Ltd (PMI). We specifically refer to PMI's response to the exporter questionnaire, which was placed on the public record on 11 September 2015.

Noting the difficulties with verifying information provided by Guang Ya in the recent review of measures (Review 248), Capral is concerned to ensure that PMI is thoroughly investigated and information provided by PMI and its related import arm in Australia is fully verified through onsite verification visits.

PMI claims that it did not export the goods to Australia during the review period (1 July 2014 to 30 June 2015), although it appears from PMI's response to the exporter questionnaire provided in Review 248 that PMI did export to Australia during that review period (1 April 2013 to 31 March 2014).

PMI has a related Australian entity, Press Metal Aluminium (Australia) Pty Ltd (PMAA), which we understand did import and sell extrusions into the Australian market during the review period. It is imperative that the Anti-Dumping Commission (the Commission) thoroughly investigates PMI's exports and PMAA's imports to be satisfied that extrusions imported by PMAA were manufactured and exported from a country other than China. We expect this would include onsite verification visits to PMI and PMAA.

Other matters identified in PMI's response to the exporter questionnaire that require further investigation include:

- A-2.6 – PMI claims that it does not have any management fees or corporate allocations charged by its parent company, however it appears that it gave a different answer in Review 248;
- D-6 – PMI claims that it does not have any commissions, discounts, rebates or allowances on domestic sales, however it appears that it gave a different answer in Review 248;
- E-1.4 – PMI claims that the difference between the cost of export and domestic packing is insignificant, despite describing different methods and materials between the two;
- I-8 – PMI has declared receipt of government grants, which require further investigation.

We also note that PMI is located in the Sansui Industrial Park in Foshan City, which is promoted by the Foshan Investment Promotion Agency (FIPA).¹ FIPA notes that the "Foshan government has designed several investment incentive instruments including tax breaks at the city and district level, preferential financing programs, free office space provision and governmental grants".² This is further reason why PMI needs to be fully investigated and all information provided should be verified.

¹ <http://fipa.gov.cn/sanshui-industrial-park-of-foshan/>

² <http://fipa.gov.cn/11-reasons-to-invest-in-foshan/>