

Hazard Systems Pty Ltd
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29 August 2016
Director, Operations 3
Anti-Dumping Commission
G.P.O. Box 1632
Melbourne, Victoria, 3000
Operations3@adcommission.gov.au

Dear Sir,

I am writing in reference to Anti-Dumping notice 2016/77 (Investigation into the alleged dumping and subsidization of certain aluminium extrusions exported to Australia from Malaysia and the Socialist Republic of Vietnam) as notified to us 16 August 2016.

Hazard Systems is part of the multi-national ECCO Safety Group of companies. The companies, including Hazard Systems and Queensland based sister-company Britax Automotive Equipment, manufacture and sell safety lighting and audible warning equipment for commercial and emergency vehicles. We have been manufacturing emergency lighting products in Australia for more than twenty-five years and worldwide for more than forty. For most of this time our products have used Aluminium extrusions of the type described in the noted Anti-dumping notice, as part of our manufactured products. The primary products that use these extrusions are lightbars intended for mounting on the roof of emergency (police, fire, ambulance) and commercial vehicles.

The ECCO Safety Group companies manufacture products using Aluminium Extrusions in Australia, in the United Kingdom and in the United States, and at sub-contract companies across the world. Products designed in one location are often manufactured at many locations, to an identical or close to identical design. As such we will cost and purchase the same products or components from different countries, to satisfy the needs of individual companies within the group. This gives us the perspective of seeing realized pricing on identical parts from different worldwide locations.

Hazard systems purchases Aluminium extrusions from Australia, Malaysia, the United States and China primarily, for manufacturing in its various Australian locations. Some of these extrusions we purchase are also purchased by other

companies within ECCO Safety group, from manufacturers in the United Kingdom, China, the United States and Mexico. Some of these extrusions are raw aluminium, others are anodized or powder-coated and some have post-extrusion work performed by the manufacturer on our behalf.

When choosing where to manufacture an extrusion we are guided both by the total cost, including duties and freight, and by the suitability of the manufacturing location to our business needs. This means we will not always choose the lowest quoted price but will compare prices from various suppliers around the world. Excluding freight and duties, we have seen that identical extruded aluminium parts are similarly priced from Malaysia compared to the United States, the United Kingdom and Mexico, for similar quantities. For the type of extrusion we purchase we have seen that Australian quoted prices are significantly higher than those from our preferred partners in the aforementioned locations.

Malaysian suppliers have attracted our business in Australia, rather than those in the United Kingdom, United States and Mexico primarily because of the country's geographical convenience and the consequent reduced freight cost and transit time.

We have exposure to only a single supplier's recent pricing from Malaysia, and do not have dealings for Aluminium Extrusions with any company in Vietnam. We have, as a worldwide company group, priced and purchased extrusions from companies in Australia, the United Kingdom, the United States, Mexico, and Malaysia. Our experience, with these limitations, is that our ex-works costs are similar from similar scale, capability and efficiency extruders worldwide and that pricing differences are primarily related to commercial matters internal to our suppliers, rather than external subsidies or taxes.

Yours Faithfully,

Matthew Godfrey
Operations Director
Hazard Systems Pty Ltd.