

6 June 2016

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

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### For Public File

Dear Sir/Madam

#### **Accelerated Review Inquiry No. 347 – Aluminium extrusions exported from P R China by Goomax Metal Co., Ltd**

Capral Aluminium Pty Ltd (“Capral”) has examined Goomax Metal Co., Ltd Fujian’s (“Goomax”) exporter questionnaire response (“EQR”) provided to the Anti-Dumping Commission (“the Commission”) and provides the following additional comments to those included in submission dated 18 April 2016.

Capral notes that Goomax has confirmed that it is in receipt of certain benefits received as detailed at Section H-2 of the EQR. Goomax has confirmed it has received benefits under certain specified (redacted) grants, along with additional grants not identified at Section H-2 of the EQR.

Goomax has provided the Commission with detailed information about five grants that it has received from the Government of China (“GOC”). Capral anticipates that the Commission will consider and quantify the full benefit received by Goomax for each grant and determine the amount of benefit received under each program.

It is Capral’s expectation that with following aggregation of the benefits received under the programs (along with the benefits received under Program 15 – Aluminium at less than adequate remuneration), the amounts received as countervailable subsidies will be determined as not negligible.

#### Conclusions on Goomax Accelerated Review

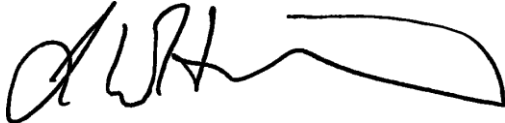
Goomax has provided the Commission with details on five subsidy programs that have provided benefits to the company during the investigation period. These benefits are in addition to the benefit received under Program 15 – Aluminium at less than adequate remuneration.

In determining an appropriate normal value for Goomax, Capral considers the methodology accepted by the Parliamentary Secretary in Review Inquiry No. 304 (Review of measures – aluminium extrusions exported by Press Metal International Limited) that was based upon normal values determined in Review inquiry No. 248 should again form the basis as the recommended normal value to apply to Goomax. Similarly, as accepted in Report No. 304, the Parliamentary Secretary is not obliged to consider the lesser duty rule as a market situation applies to aluminium extrusions sold in China.

The Commission is in receipt of information from Goomax in relation to countervailable subsidies that enables it to assess the level of countervailable subsidy received by Goomax. Capral anticipates that a countervailing notice will apply to Goomax quantifying the full benefit received by Goomax from the GOC over the investigation period.

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

Yours sincerely

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

Luke Hawkins  
General Manager – Supply and Industrial Solutions