

24 October 2017

Mr Tim King  
Case Manager  
Investigations 3  
Anti-Dumping Commission  
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**Public File**

Dear Mr King

**Investigation No. 442 – Aluminium extrusions exported from P R China (by Guangdong Jiangsheng Aluminium Co., Ltd and Guangdong Zhongya Aluminium Company Limited) and exports from Thailand**

I. Introduction

I refer to the Anti-Dumping Commission's ("the Commission") investigation No. 442 concerning exports of aluminium extrusions from China (by Guangdong Jiangsheng Aluminium Co., Ltd and Guangdong Zhongya Aluminium Company Limited) and from Thailand.

Capral Limited ("Capral") provides this submission to the Commission concerning affiliated parties of Guangdong Zhongya Aluminium Company Limited ("Zhongya").

II. Guangdong Zhongya Aluminium Co., Ltd

Capral has obtained background information concerning Guangdong Zhongya Aluminium Co., Ltd, its related companies, and its management.

Zhongya is a manufacturer of aluminium products (including aluminium extrusions). The company was incorporated on 30 November 2005 and is located as follows:

Inside Yalv Industrial Park  
Zhaoqing Hi-tech Industrial Development Zone  
Guangdong Province, 526000 PR China

Zhongya's head office is located at the same address in the Zhaoqing Industrial Park.

Zhongya has a related company – Karlton Aluminium Company Limited (Hong Kong) which it identifies as its "Parent Company" along with another company, Zhongya Shaped Aluminium (HK) Holding Limited. Zhongya has two Directors – Kuang Xieguang and Kuang Shun E.

Please refer to Confidential Attachment 1 confirming the above details.

III. Karlton Aluminium Company Limited

Karlton Aluminium Company Limited (“Karlton”) is identified as a “sales office” for its associated company (presumably Zhongya). Karlton’s address is:

Room 1105, 11/F  
Railway Plaza  
39 Chatham Road South  
Tsim Sha Tsui, Kowloon, Hong Kong.

Karlton has three shareholders, of which Kwong Wing Wah and Kuang Xieguang are the main shareholders. Both are also listed as Directors of Karlton

Please refer to Confidential Attachment 2 confirming Karlton’s details.

IV. Zhongya Shaped Aluminium (HK) Holdings Limited

Zhongya Shaped Aluminium (HK) Holdings Limited (“ZSA”) is the second identified ‘parent’ company of Zhongya. ZSA has the same registered address as Karlton. ZSA also has the same shareholders listed as Karlton, as well as two common Directors – Kwong Wing Wah and Kuang Shun E.

It is also noted that the Directors Kuang Shun E and Kwong Wing Wah appear to have neighbouring residential addresses.

Please refer to Confidential Attachment 3 for details of ZSA.

V. Darley Aluminium Pty Ltd

It is Capral’s understanding that Zhongya’s exports to Australia are primarily to an Australian importer, Darley Aluminium Pty Ltd (“Darley”). Darley has operated since 31 March 2009, is located as follows:

Darley Aluminium Pty Ltd  
8 Tyrone Place  
Erskine Park, NSW 2759

Darley has two identified ‘Sister’ companies – Darley Aluminium Trading Pty Ltd and Darley Aluminium Holdings Pty Ltd. Darley also has an identified subsidiary company – DL Aluminium Holdings Pty Ltd. Darley is owned by Can Hui Lu. A Richard Ding Li is identified as the sole Director of Darley.

Please refer to Confidential Attachment 4 for details related to Darley.

VI. Darley Aluminium Trading Pty Ltd

Darley Aluminium Trading Pty Ltd (“DAT”) is involved in ‘aluminium extrusion and distribution’. The company has the same business address as Darley, and identifies Kuang Shun E and Can Hui Lu as shareholders. Mr Richard Ding Li is listed as the current director (same as Darley).

Kuang Shun E is also a Director of Zhongya and ZSA (the exporters of aluminium extrusions from China to Australia).

Please refer to Confidential Attachment 5 for details for DAT.

VII. Darley Aluminium Holdings Pty Ltd

Darley Aluminium Holdings Pty Ltd (“DAH”) also has a business address registered at the same address as Darley. DAH is similarly owned by Can Hui Lu, with current Directors listed as Guo Yi Rebecca Li and Can Hui Li (of the same residential address).

Please refer to Confidential Attachment 6 for details of DAH.

VIII. Common Management between exporter and importer

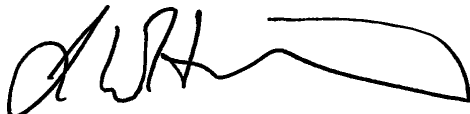
The information provided by Capral confirms that one of Zhongya's Directors – Kuang Shun E is an owner of ZSA (i.e. the parent company of Zhongya) and holds 49 per cent of the shareholding in Zhongyar. Kuang Shun E is also a shareholder and a Director listed on the Australian affiliated company, DAT. The common management between the Chinese exporter – whether it is Zhongya, Karlton or ZSA is a factor that impacts the determination of export price under subsection 269TAB of the *Customs Act*. It is incontestable that a principal owner of the Chinese holding company for the Chinese aluminium extrusions manufacturer Zhongya, is also a Director of the Australian trading company, DAT.

Darley's activities in the Australian market have contributed to pricing pressures experienced by Capral.

Capral considers that the export price for goods exported by Zhongya are impacted by the relationship of the Chinese and Australian affiliated companies due to the ownership/management role of Kuang Shun E. Capral requests the Commission to examine the impact of the common management of the Chinese exporter and Australian importer of aluminium extrusions marketed in Australia by Darley.

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



Luke Hawkins  
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