



Customs Act 1901 - PART XVB

ANTI-DUMPING COMMISSION CONSIDERATION REPORT NO. 263

Submissions to the Investigation:

**Review of Anti-Dumping Measures on certain Aluminium Road Wheels exported to
Australia from The People's Republic Of China**

(Non-confidential)

Submission made by Jagur International (Aust.) Pty Ltd (trading as Superstar Tyres and
Parts), Australian Importer

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Dear Sir/Madam,

**Submissions to the investigation:
Review of Anti-Dumping Measures on certain Aluminium Road Wheels exported to
Australia from The People's Republic Of China**

Jagur International (Aust.) Pty. Ltd., through its division Superstar Tyres and Parts ("Superstar Tyres"), is an Australian importer of Aluminium Road Wheels.

Jagur International supports the decision to review the current anti-dumping measures placed on the exportation of certain aluminium road wheels from China to Australia (as prescribed in Australian Customs Dumping Notice (ACDN) No. 2012/33). Jagur International concurs with the reasons for review, as detailed in the application made by Jiangsu Yaozhang Aluminium Wheel Co., Ltd (outlined in *Consideration Report No. 263*). Since the original investigation, normal value, export prices and the amount of countervailable subsidy have indeed changed and therefore, all exporters, whether originally considered to be cooperating or non-cooperating, should be subject to the review.

Many of the affected companies in China, including those who supply to Jagur International, were considered non-cooperating exporters since they did not respond to the Exporter Questionnaire. Without knowing details as to why these exporters did not respond to the original questionnaire, it would be reasonable to not only review the change in normal value and export prices, but also to allow affected exporters a second chance to respond to the questionnaire. Jagur International believes that the current anti-dumping measures are creating somewhat of a monopoly in the Australian aluminium road wheels market and in fact causing more harm than good. PDW being the sole exporter that is exempt from the policy means that it can continue to practice price discrimination (whether this be in a predatory way or not is unsure).

After assessing the variable factors in relation to the current aluminium road wheels anti-dumping measure, Jagur International would suggest that, at the least, the 'lesser duty rule' be applied and the minister impose a duty on relevant exporters which is sufficient to remove any material injury, but which may be less than the dumping margin and the current measures in place.

Lastly, having faith in the Australian government, Jagur International submits that the all relevant variables be taken into consideration during the view, including the issue of whether or not the current anti-dumping policy is being used as a tool to simply improve the competitive position of the original complainant against other companies.

Yours Sincerely,

Harinder Singh
(Director, Jagur International (Aust.) Pty. Ltd.)