

23rd May 2014

The Director
Operations 3
Anti-Dumping Commission
Customs House
1010 La Trobe Street
Docklands VIC 3008

By email: acu@adcommission.gov.au

Dear Director,

Anti-Circumvention Inquiry into the Avoidance of the Intended Effect of Duty

Non-Confidential – Public Record

Aluminium Specialties Group Pty Limited ("ALSPEC") wishes to make this submission as an interested party in respect of the Anti-Circumvention Inquiry into the avoidance of the intended effect of duty.

1) The Business of ALSPEC

ALSPEC is an Australian building products distribution business predominantly involved in the national supply of extruded aluminium systems and related hardware. ALSPEC, through its parent company ASP Aluminium Holdings Pty Limited, also holds a 50% equity interest in Independent Extrusions Pty Ltd ("INEX"), an Australian based extrusion business.

2) Interested Party

ALSPEC is an interested party as defined by subsection 269T(1) of the Customs Act 1901.

3) Impact of Dumping and Countervailing Duties in the Australian Market

ALSPEC has observed varying degrees of impact as a result of the imposition of dumping and countervailing duties on imports of aluminium extrusions from China since October 2010.

In most cases where duties have applied to our Chinese suppliers, we have incurred price increases from these suppliers as a direct result of the imposition of the duties. In a number of other cases our Chinese suppliers have chosen to withdraw supply as they have become uncompetitive as a result of the imposition of the duties.

In respect of the P&O companies ("P&O") and Oceanic Aluminium Pty Ltd ("Oceanic") we have not seen any evidence of price increases to the general market that would reflect the dumping and countervailing duties that were introduced in October 2010. ALSPEC competes in similar markets to P&O and Oceanic and we often have the opportunity to provide customers with pricing offers in direct competition to these companies. Since the introduction of the dumping and countervailing duties we have not experienced any improvement in our ability to compete against the prices offered by P&O or Oceanic, even with the benefit that we have of sourcing competitive products from other suppliers based in China and from other South East Asian countries.

4) Conclusion

ALSPEC continues to support both local and foreign suppliers on the grounds of fair trade practices. The imposition of dumping and countervailing duties from October 2010 was designed to ensure a fair playing field for all industry participants however it appears in the case of PanAsia and their supply arrangements with P&O and Oceanic that the desired outcomes have clearly not been achieved.

We agree with the general assertions made by Capral in their application for an inquiry into avoidance of the intended effect of duty. The activities of P&O and Oceanic continue to cause material injury to ALSPEC and the Australian aluminium extrusion industry as a whole. We support a thorough inquiry by the Anti-Dumping Commissioner into the operations of P&O and Oceanic and expect the Commissioner will implement any measures within its powers to ensure ongoing fair practice by P&O and Oceanic.

We would be pleased to provide any further information as required by the Anti-Dumping Commissioner in respect of this inquiry.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'D. Kingsford', written over a horizontal line.

Darren Kingsford
Managing Director