



8 July 2014

The Director
Operations 4
Anti-Dumping Commission
5 Constitution Avenue
Canberra ACT 2601

Review 248: Sampling of exporters

This submission is made on behalf of Capral Ltd, a member of the Australian aluminium extrusions industry, in relation to Review 248 of certain aluminium extrusions exported to Australia from China. We specifically refer to the preliminary information request (PIR) sent to exporters and the sampling of exporters for further investigation.

Our preference would be for all exporters, or at least those that responded to the PIR, to be requested to complete an exporter questionnaire, which would be consistent with the Commission's approach in the current investigation of deep drawn stainless steel sinks. Our understanding of the Commission's approach in that case is that sampling of exporters for verification has only occurred following receipt of full and complete questionnaire responses from exporters.

However, should the Commission decide to limit the number of exporters required to complete a questionnaire, we ask the Commission to include the following exporters in the sample for a questionnaire and full verification:

- PanAsia, Kam Kiu and New Zhongya—we assume that the exporters originally selected will be included in the sample, as all three continue to be major exporters to Australia.

- [REDACTED]

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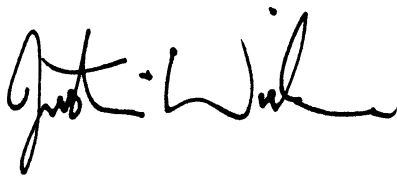
- [Redacted]

- [Redacted]

[The names and reasons for selecting the additional exporters above are commercially sensitive. Revealing specific information could jeopardise existing trading relationships with members of the Australian industry. In summary we have suggested additional exporters be investigated in this review to:

- broaden the sample beyond the exporters originally investigated
- provide benchmarks for certain costs and subsidy levels, and
- expose possible circumvention of duties.]

We understand the resources of the Commission are limited in terms of the number of exporters that it can fully investigate, however we urge the Commission broaden the sample beyond those exporters originally investigated due to the unique issues and complexities of this case. We also note the capacity for the Commission to seek an extension for the review beyond the 155-day timeframe and the willingness of the Parliamentary Secretary to grant such extensions in recent cases.



Justin Wickes
Director

2 [Redacted]

3 [Redacted]