

7 December 2017

The Director  
Investigations 3  
Anti-Dumping Commission  
Level 35  
55 Collins Street  
Melbourne Victoria 3000

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**Public File**

Dear Sir/Madam

**Exemption Inquiry No. 0055 – Aluminium extrusions exported from Malaysia**

I. Application

The Anti-Dumping Commission (“the Commission”) has received an application under sections 8(7)(a) and 10 (8)(a) of the Customs Tariff (Anti-Dumping) Act 1975 (“the Dumping Duty Act”) for exemption from dumping duty and countervailing duty in respect of certain aluminium extrusions (“the goods”) exported from Malaysia.

The application is by Ezy Tools Pty Ltd (“Ezy Tools”).

Ezy Tools has claimed that “like goods or directly competitive goods are not offered for sale in Australia to all purchasers on equal terms under like conditions having regard to the custom and usage of trade”.

Further to its opposing response to the Exemption Application (EPR, Document 3), Capral Limited (“Capral”) seeks to comment on the technical specifications concerning the claimed 12 unique extrusions the subject of the application.

II. Capability to produce and supply the goods

It has been argued by Ezy Tools that “There are no known companies in Australia who are willing to make our Australian designed 12 unique extrusions<sup>1</sup>”. Capral has reviewed the specifications applicable to Ezy Tools requirement (Appendix 14 to Ezy Tools application). Capral can confirm that although it does not currently have the dies for the product drawings identified in Appendix 14, Capral is capable of producing the sections in all of the drawings identified.

Additionally, Capral is prepared to cut the dies and supply Ezy Tools with the goods on the same commercial terms that Capral supplies similar sized customers in Australia.

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<sup>1</sup> Ezy Tools Application for Exemption, EPR Document No. 1, P.4.

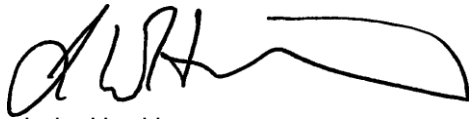
III. Closing Remarks

Capral maintains its objection to the granting of an exemption for certain aluminium extrusions the subject of Exemption Inquiry No. 0055. Capral reaffirms that it has previously sold the goods the subject of the application to Ezy Tools. Although Capral no longer has the dies to produce the goods, Capral is willing to cut the dies and manufacture the extrusions to Ezy Tools' specification as required.

Capral welcomes any further questions from the Commission concerning its capability to manufacture the goods under investigation.

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

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

Luke Hawkins  
General Manager – Supply and Industrial Solutions