

29 November 2017

Mr Jukka Mantynen
Case Manager
Operations 2
Anti-Dumping Commission
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Melbourne Victoria 3000

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Public File

Dear Mr Mantynen

Investigation No. 447 – Aluminium extrusions exported through one or more third countries from The People’s Republic of China

I. Background

I refer to Consideration Report No. 447 published by the Anti-Dumping Commission (“the Commission”) concerning inquiries relating to the circumvention of anti-dumping measures involving transshipment via third countries including Indonesia, Malaysia, the Philippines or Thailand.

As you are aware, the identification of entities involved in the transshipment of the circumvention goods is not a simple exercise. Capral Limited (“Capral”) identified in its application several entities understood to have been involved in transshipment activities. Following additional inquiries, Capral has identified further parties that may be involved in circumvention activities.

II. Parties involved in transshipment activities

Capral understands that the following parties have confirmed participation in the transshipment of aluminium extrusions from China via third countries.

(a) [company name]

[Company name] confirms that it can export aluminium to Australia via transshipment. Currently involved in transshipping goods to [country] and [country].

(b) [company name and contact details]

[Company name] claims it has transhipped product via Thailand, Malaysia and Taiwan. Further it claims to have moved product from [loading port, country] to [port, country] (refer supporting documentation at Confidential Attachment 1).

(c) [company name]

[Company name] advises that it can do transhipments to Australia, and [destination port].

The attached spreadsheet (Confidential Attachment 1) identifies companies that have been approached concerning the provision of transshipping services. The companies highlighted in blue have not yet responded to the inquiries made.

III. Transshipment companies to other destinations (except Australia)

The following companies were identified as having orchestrated transshipment of goods from China to other destinations (most notably [country]) except to Australia:

(a) [Company name and contact details]

(b) [Company name and contact details]

(c) [Company name and contact details]

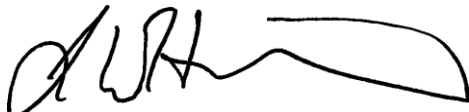
IV. Contact from ADC

Capral anticipates that the Commission will approach the above identified companies that have confirmed can provide transshipment activities for goods the subject of anti-dumping measures.

Capral will provide further updates from outstanding requests for information from entities identified in Confidential Attachment 1 as it becomes available.

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
General Manager – Supply and Industrial Solutions