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FOR PUBLIC RECORD

Attention: To whom it may concern
Re: Import submission

Unlike many Chinese mill that import directly into Australia and receive incentives for export, Abra does not, nor has ever received any benefit, assistance, incentive, compensation or rebate from the Chinese Government. It is for this reason the I am making submission for your consideration in providing Abra an exemption from the countervailing, dumping and ASP.

The report into the importing of aluminium from China took its findings from the fact that aluminium was being sold below the true market price due to certain mills being compensated by the Chinese Government in the way of schemes 1,2,3,4,5,6,7,8,9,10,13,16,17,18,26,29,32 and 35. These schemes were in conjunction with the mills ability to buy ingot from the Shanghai Metal Exchange.

Taking this as the basis for imposing extra costs on aluminium that is imported from China into Australia, we ask that the Australian Government consider this submission as a one on one case that Abra be exempt from any imposed cost above the standard import duty from China.

1: Abra is an importer of aluminium products sourced from several extrusion mills in different countries which include China. Abra is not an extruder or in any way part of an extrusion mill. Abra is a stand alone importer of aluminium.

2: Abra does not purchase aluminium for a fixed standard \$/kg rate. Abra purchases its extrusion based on the combination of the following pricing method.

A: Abra buys a nominate quantity of aluminium at the London Metal Exchange (LME) price on the day of order. In addition to the LME cost, Abra pays a per metric ton surcharge for the mill to hold our order for a number of days. If Abra does not order the nominated quantity within the agreed holding time Abra also has a premium penalty applied to any amount of aluminium not used within this period. Abra does not, and has never received any rebate or compensation for this purchase order.

B: Abra is charged by the mill a production management fee per metric ton to produce the extrusion. Any other finishing process will be added to the base price according to the process required. This includes but is not limited to powder-coating, anodizing, special cutting requirements' special packaging or any kind of fabrication.

C: Abra pays all shipping, insurance, port fees, import duty and associated inland costs into our site locations.

There are several mills that Abra have difficulty in competing with in the Australian market. One of these company's in quite a few instances has sold product into the Australian market well below Abra's cost price. In these instances there can only be two scenarios. Either they are selling product below their own cost or they are getting assistance or rebate to allow them to do so.

Originally when the anti dumping investigation was taking place, we could not believe that this company was considered not to be dumping in the Australian market. Abra welcomes the review but do not believe that anything has changed with regards to mills that have been receiving an unfair advantage, especially when that the Shanghai Metal Exchange price for aluminium is cheaper than the London Metal Exchange.

Looking forward to your earliest reply.
Kind Regards



Don Allen
Managing Director