

Operations 3, Anti-Dumping Commission

Public

**Review Investigation 392 Aluminium Extrusions from China
Press Metal International Ltd (PMI) Individual *Ascertained Export Floor Price***

For the following reasons PMI requests, to the extent any anti-dumping margin found (which PMI denies), the ADC establish PMI's **individual** (variable only rate—zero fixed component and zero countervailing) RMB FOB/kg ascertained export floor price rather than PMI following *residual exporter* dumping measures:

Setting a PMI individual rate despite PMI's 392 *Review* period shipment volume

- 1 Attachment A to ADN 2017/38 notifying initiation of Review 392 recognises PMI as, although yet a *selected exporter*, *the review must extend to (PMI) unless to do so would prevent its timely completion*. Rather than shipment volume, the Commissioner's consideration limited to *selected exporters* level of cooperation, number of other exporters seeking individual examination and Commission's resources to verify
- 2 Nothing in ADN 2017/38 limits the ADC from setting a PMI individual rate or from choosing PMI as a *selected exporter*. ADN 2017/38 works the opposite—it invites exporter questionnaires from shippers other than the ADN named *selected exporters*
- 3 PMI and its related company Australian importer (Press Metal Aluminium Australia Pty Ltd (PMAA)) welcome and ready for on or off site verification. From *Review 362* ADC already experienced with PMAA and its Malaysian supplier verification

Ascertained export floor price rather than other measures

- 4 Consistent with ADC *Review* practice where an exporter has zero or limited review period shipments—even where other than a *new exporter*—as in PMI's *Review 304* result where PMI had no shipments
- 5 *Review 304* established zero countervailing and accordingly zero countervailing duty
- 6 PMI has already provided *Exporter Questionnaire* and corresponding spreadsheets for the ADC to easily establish a floor price
- 7 PMAA sold in Australia those 392 *Review* period PMI sourced extrusions for a more than reasonable commercial profit—in line with PMAA's 2016 total profit
- 8 PMI sold those shipments to PMAA for a higher margin than its cost to make and sell and at a price comparable to like profiles PMI sold domestically in China
- 9 PMI a respected world standard aluminium extrusions mill for both China domestic and worldwide exports and its 392 *Review* period and earlier accounting records already with the ADC and of utility for benchmarking



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