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Anti-Dumping Commission  
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**Public File**

Dear Mr Crooks

**Aluminium Extrusions exported from Malaysia and Vietnam (Investigation No. 362) – Submission by Global Vietnam Aluminium**

I refer to the submission by Global Vietnam Aluminium Company Limited (“GVA”) concerning the determination of the exporter’s normal value for the purposes of Preliminary Affirmative Determination (“PAD”) No. 362.

GVA is contesting the absence of adjustments to its normal value which it asserts reflects ‘specific differences’ between its manufacturing operations and those of other Vietnamese cooperating exporters East Asia Aluminium Company Ltd (“EAA”) and Mien Hua Precision Mechanical Co., Ltd (“Mien Hua”). Normal values for GVA have been based upon domestic selling prices for EAA and Mien Hua during the investigation period (i/e/ 1 July 2015 to 30 June 2016).

GVA confirms that it has not made domestic sales of like goods during the investigation period. GVA acknowledges that the Anti-Dumping Commission (“the Commission”) has correctly determined normal values for GVA based upon the domestic sales of EAA and Mien Hua (where there is an absence of domestic sales in the ordinary course of trade by GVA).

GVA quotes an extract from the Dumping and Subsidy manual that reflects where the exporter’s normal value reflects the domestic sales of another seller, the Commission will provide that exporter with information to “defend its interests”. The referred to information relates to the ‘type of products being sold on the domestic market’ and the ‘other seller’s domestic distribution methods for level of trade comparisons’.

GVA indicates it does not have any understanding of the types of product sold by EAA and Mien Hua on the domestic market in Vietnam, or the nature of those sales (i.e. level of trade and delivery terms). In the absence of this information, GVA has sought to suggest further additional grounds that it considers warrant an adjustment to normal values. It is claimed that:

- Domestic sales in Vietnam are predominantly for small orders to end-users and OEMs of customer and complex profiles with alleged tight tolerances;
- The domestic sales are complex and therefore attract higher manufacturing overheads due to lower productivity and efficiencies;
- By contrast, the Australian market is less complex and can be supplied any extruder in the Asian region.

Capral Limited ("Capral") rejects GVA's request for adjustments to normal value based upon claim that are not supported by factual evidence. Further, it is unlikely that EAA would agree with GVA's assessment of the domestic market in Vietnam.

It is Capral's expectation that GVA would be able to substantiate these claims (if correct) with factual evidence. Such allegations cannot be accepted on the basis of mere conjecture, as is evidenced in GVA's claims.

Capral cannot comment on GVA's redacted commentary concerning its manufacturing operations. It would appear, however, that it is suggesting that the Vietnamese exporters manufacture a type of premium aluminium extrusion for the domestic market that is not readily comparable with the aluminium extrusions it exports to the suggested *commodity* Australian market for aluminium extrusions.

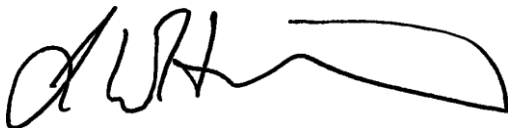
Again, it does not appear that GVA has provided any factual evidence in support of its claims. Should the arguments presented by GVA have any basis or foundation, Capral would anticipate that the technical differences and the manufacturing advantages it asserts exist should be reflected in price premiums for goods produced and manufactured by GVA. That is, selling price premiums for alleged complex profiles and technical differences must be evidenced in GVA's selling prices.

Finally, Capral submits that any alleged grounds upon which GVA asserts it manufactures and supplies complex and premium aluminium extrusions to the market require adequate disclosure upon which all interested parties may be permitted to comment.

In the absence of information provided by GVA that does not support the existence of clear price differentials between types of like goods, adjustments to GVA's normal value for complex and premium products must not succeed.

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  
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