

16 November 2016

Mr Gavin Crooks  
Assistant Director - Investigations  
Operations 3  
Anti-Dumping Commission  
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## Public File

Dear Mr Crooks

### Aluminium Extrusions exported from Malaysia and Vietnam (Investigation No. 362) – Superb Aluminium

#### I. Background

I refer to Exporter Questionnaire Response (“EQR”) for Superb Aluminium and the Anti-Dumping Commission’s (“the Commission”) Preliminary Affirmative Determination (“PAD”) No. 362 in respect of aluminium extrusions exported from Malaysia and Vietnam.

Capral Limited (“Capral”) would like to highlight with the Commission Capral’s concerns in relation to the preliminary negative 4.3 per cent dumping margin assessed for Superb Aluminium Industries Sdn Bhd (“Superb Aluminium”) of Malaysia.

#### II. PAD No. 362

The preliminary dumping margins upon which PAD No. 362 have been assessed rely upon the completed exporter questionnaires for the relevant cooperative exporter(s).

In this instance, Superb has completed a compliant questionnaire response with which the Commission was satisfied.

#### III. Superb Aluminium’s sales in Australia

Capral understands that Superb Aluminium is supplying [*customer and location*] with aluminium extrusions sourced from its affiliated company in Malaysia. It is Capral’s further understanding that [*customer*] previously sourced aluminium extrusions from [*country*], before switching to dual sourcing from [*suppliers*].

Capral has provided the Commission with information [*commercially sensitive pricing details*] during the investigation period. It is clear from the information provided that the [*nature of information*] throughout the 2015/16 investigation period, when contrasted with other customers.

Capral is further aware that the product purchased by [*customer*] is predominantly finished aluminium extrusions – that is, powder coated goods. These goods sell at a premium to mill finished product. Based upon the reduced selling prices on offer from [*supplier*], Capral is concerned that the selling prices into [*customer*] for [*supplier*] exported goods do not reflect the full selling price for powder coated

aluminium windows (i.e. the exported goods appear to be sold at a loss once the LME, MJP premium and value-add margin, including for powder coating are included).

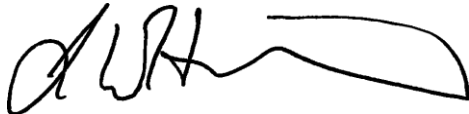
IV. Request for review of Superb Aluminium's selling prices

Based upon Capral's evidence supplied to the Commission on the [*commercially sensitive pricing details*], plus allowances for powder coating, it is Capral's position that exports to Australia by Superb Aluminium are at dumped and/or subsidized prices.

Capral requests the Commission to validate the selling prices in the Australian market by the importer Superb Aluminium and establish that all costs have been recovered in the final market selling prices throughout the investigation period.

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