

3rd April 2018

Mr Tim King
Investigations 3
Anti-Dumping Commission
Level 35
55 Collins Street
Melbourne Victoria 3000

Email: investigations3@adcommission.gov.au

Public File

Dear Mr King

Investigation No. 442 - Aluminium extrusions exported from P R China and Thailand – Guangdong Jiangsheng Aluminium Co., Ltd Exporter Questionnaire Response

Capral Limited (“Capral”) seeks to draw to the attention of the Anti-Dumping Commission (“the Commission”) the requirements of Australian Customs Dumping Notice No. 2012/42 concerning the ‘Provision of information for the public record’ to require exporters to detail – in a non-confidential summary – the nature of information that has been redacted from a commercial-in-confidence document provided to the Commission.

ACDN No. 2012/42 requires:

“All redacted or deleted text in documentation provided for the Electronic Public Record (ER) must be accompanied by a summary that contains sufficient detail to allow a reasonable understanding of the substance of the information. This may be done by providing bracketed text following any redacted text.”

The Guangdong Jiangsheng Aluminium Co., Ltd (“Jiangsheng”) exporter questionnaire response (“EQR”) has flouted with the requirements of ACDN 2012/42. Specifically, the Jiangsheng EQR fails to disclose in a non-confidential form:

- A description of the goods exported to Australia (Section C-1);
- Identified the goods exported to Australia (Section C-2);
- Identify the goods sold on the domestic market (Section C-3); and
- Claimed that no technical or illustrative material is available for the goods under investigation (how could Jiangsheng sell goods without illustrative materials?).

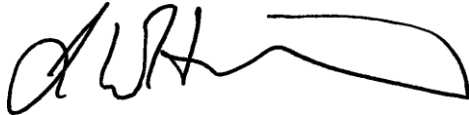
Jiangsheng’s EQR response refers to the attachments for the information contained in the above mentioned Section C of the EQR. The attachments, however, are considered “Confidential”.

Capral requests that the Commission be vigilant in monitoring the responses of exporters to claim confidentiality in respect of information which is clearly not commercially-sensitive in any way. It is considered unlikely that an aluminium extrusions manufacturer does not produce illustrative material for the sale and marketing of its goods, as is claimed by Jiangsheng.

Capral requests the Commission to require Jiangsheng to provide the information required by Sections C-1 to C-3 of its EQR in a public file version at the earliest possible time.

If you have any questions concerning this letter, 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

A handwritten signature in black ink, appearing to read 'LHAWKINS', with a long horizontal flourish extending to the right.

Luke Hawkins
General Manager – Supply and Industrial Solutions