

15 December 2016

Mr Gavin Crooks
Assistant Director - Investigations
Operations 3
Anti-Dumping Commission
GPO Box 1632
Melbourne Victoria 3001

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Public File

Dear Mr Crooks

Aluminium Extrusions exported from Malaysia and Vietnam (Investigation No. 362) – Exporter Verification Report – LB Aluminium

Capral Limited (“Capral”) seeks to draw to the attention of the Anti-Dumping Commission (“the Commission”) the following omissions that are considered relevant to the determination of dumping margins in respect of the Malaysian exporter LB Aluminium Berhad (“LB Aluminium”).

Section 6.4 of the LB Aluminium Exporter Verification Report (the Report”) confirm adjustments made for domestic and export inland freight, and domestic and export credit. No further adjustments were made. It is noted in the Press Metal Berhad (“PMB”) Exporter Verification Report that an upward adjustment was made for “export handling and other costs” that relate to costs associated with exporting aluminium extrusions to Australia.

It is expected that as an upward adjustment was applied to Press Metal Berhad’s normal value a similar adjustment is required to LB Aluminium’s normal value.

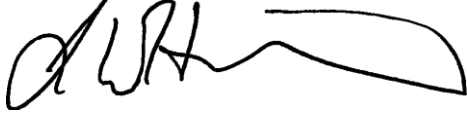
It is further considered that the Malaysian exporters incur costs associated with the metal pallets/skids used to load the containers for export. The cost of this facility is estimated at US\$xxx-\$xxx per container (US\$xxx-\$xxx each), or approximately US\$x.xx per kg. This cost may be included in the aforementioned ‘export handling and other costs’ however, irrespective of this, it is a cost incurred on export sales that does not occur in respect of domestic sales and must be included as an adjustment to the exporter’s normal value (including LB Aluminium).

Capral acknowledges the Commission’s comments concerning “no discernable difference” between domestic and export packing costs incurred by LB Aluminium. However, Capral re-emphasizes that the packing costs for exported aluminium extrusions are higher than for domestic sales as the mode of transport associated with export is prone to a greater likelihood of damage during transportation. The packing required for exportation is therefore of a higher quality than that required for export to ensure transported goods are not damaged (and hence attracts a higher associated cost).

Once full account is made of the additional costs associated with exporting aluminium extrusions by way of upward adjustments to LB Aluminium’s normal value, it is Capral’s view that a dumping margin exceeding negligible levels will be determined for LB Aluminium.

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

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