

16 May 2018

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

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### Public File

Dear Mr King

#### **Investigation No. 442 – Aluminium Extrusions exported from P R China and Thailand – Guangdong Jiangsheng Aluminium C., Ltd Verification Report**

Capral Limited (“Capral”) has reviewed the Guangdong Jiangsheng Aluminium Co., Ltd (“Jiangsheng”) verification report and provides the following comments for consideration by the Anti-Dumping Commission (“the Commission”).

Normal values for Jiangsheng will be determined under subsection 269TAC(2)(c) of the *Customs Act* using a constructed methodology due to the Commission’s determination that selling prices for aluminium extrusions sold in China are influenced by the Government of China (“GOC”) and a particular market situation applies. The Commission will construct Jiangsheng’s normal value by taking account of the verified costs of the exporter, with a market price for aluminium included in the constructed costs. Jiangsheng’s surrogated aluminium cost should reflect the following elements calculated for the investigation period:

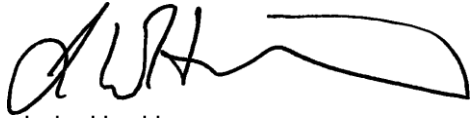
- Aluminium at the London Metal Exchange (“LME”) rate; plus
- Billet premiums; plus
- Major Japanese Port (“MJP”) premium (applicable to all aluminium purchases in South East Asia).

The aluminium cost (including the identified components listed above) is substituted into the exporter’s production costs. In addition to these costs, the Commission is required to determine selling and general administration expenses and an amount for profit to be included in Jiangsheng’s normal value. Capral submits that the level of profit to be included in Jiangsheng’s constructed normal value is required to be determined based upon Jiangsheng’s profit achieved on domestic sales made in the ordinary course of trade during the investigation period.

Capral would also anticipate that the Commission would include upward adjustments for packing costs associated with Jiangsheng’s export sales of the goods to Australia, including: steel trolleys, wooden crates and inter leave paper.

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, sweeping horizontal stroke extending to the right.

Luke Hawkins  
General Manager – Supply and Industrial Solutions