

15 August 2018

Mr Jukka Mantynen  
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Anti-Dumping Commission  
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## Public File

Dear Mr Mantynen

### Investigation No. 447 – Circumvention inquiry - Aluminium extrusions- Press Metal

I refer to the verification reports for Press Metal International Pty Ltd (“PMI”) and Press Metal Berhad (“PMB”) recently placed on the electronic public register (EPR Documents 53 and 54 respectively).

The Anti-Dumping Commission’s (“the Commission”) has met with both companies and determined there was:

- *No evidence related to packaging or labelling that indicated that goods were exported from China to Australia through Malaysia;*
- *No material discrepancies in PMI’s records related to sales, purchases, stock and production of aluminium extrusions;*
- *No packages of aluminium extrusions for export to Australia, either directly from China or through a third country;*
- *No documentary evidence of aluminium extrusions being exported to Australia from China through Malaysia or other third countries; and*
- *No physical or other evidence of aluminium extrusions being exported to Australia from China through Malaysia or other third countries.*

The Commission’s findings are contrary to Capral Limited’s (“Capral”) understanding concerning imported aluminium extrusions (“the goods”) by Press Metal Aluminium Australia Pty Ltd (“PMAA”) that originated in China and exported through Malaysia. [*Comment concerning claims of transhipped goods*]. Capral has alerted the Commission that:

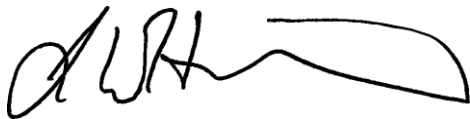
- A [*relationship to Capral and company name*] provided an [*notification and export source*] from China via Malaysia to Australia;
- A [*statement supporting evidence of transshipment*] containers being transhipped; and
- [*statement re knowledge of personnel*] that had full knowledge of the transshipments occurring.

The references by [*name, and relationship to Capral*], and [*parties*], retaining full knowledge of the activities of [*entities and transshipment activities*] to Australia cannot be ignored. Capral would anticipate that the exporting parties would unlikely divulge any details to the Commission of any activities associated with the circumvention of measures.

Capral anticipates that the Commission will fully investigate representations highlighted with the Commission by [*parties and personnel*]. Capral looks forward to understanding the outcomes of the Commission's investigations with [*parties and personnel*].

If you have any questions concerning the attached, please let me know. I can be contacted on (02) 8222 0113 or you may contact 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