



15 May 2018

**NON- CONFIDENTIAL**

Mr Tim King  
Assistant Director  
Anti-Dumping Commission  
55 Collins Street  
MELBOURNE VIC 3008

Dear Mr King,

**ALUMINIUM EXTRUSIONS FROM CHINA AND THAILAND**

This submission, on behalf of Guandong Jiangsheng Aluminium Co Ltd (“Jiangsheng”), is in response to Capral’s submission of 2 May 2018 alleging that future exports of aluminium extrusions to Australia by Jiangsheng (and Zhongya) pose a threat of foreseeable and imminent material injury to the Australian industry and requesting urgent imposition of provisional anti-dumping measures on these future exports.

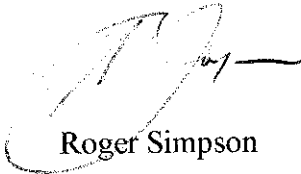
The key issue is that for anti-dumping measures to be imposed on future exports by Jiangsheng, exports by Jiangsheng during the investigation period of the current investigation must have been at dumped prices, and this is not the case. Jiangsheng’s exports of aluminium extrusions during the investigation period of the current investigation were not at dumped prices.

Notwithstanding that Jiangsheng’s exports were not at dumped prices and therefore anti-dumping measures cannot be imposed on its future exports, we would like to bring to your attention the fact that Capral’s allegation that future exports of aluminium extrusions by Jiangsheng pose a threat of material injury to the Australian industry is not based on facts, as is required by Article 3.7 of the WTO Anti-Dumping Agreement which Capral has cited in its submission. Capral’s allegations that are not factually based are as follows:

- An increase in imports from China in just the months of November 2017 and January 2018 does not create a situation that a significant rate of increase of exports from China by Jiangsheng is clearly foreseen and imminent. In fact, Jiangsheng’s imports during these two months have historically been significantly higher than the yearly average due to November being the start of the industries “peak season” and January including additional shipments that were delayed so as not to arrive during Christmas closure;

- Capral has presented grossly inaccurate figures concerning Jiangsheng's press utilisation and production capacity;
- The recent imposition of protectionist tariff barriers by the US Government will have zero impact on Jiangsheng's exports to Australia. Jiangsheng exports an insignificant amount of specialised bright anodised material to the US and this business will continue, despite the increased tariffs;
- It is not correct that Jiangsheng has excess production capacity that can be diverted to exports to Australia; and
- There are no factual grounds for Capral's claim that Jiangsheng is likely to have "built inventories both in China and Australia".

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Roger Simpson', with a horizontal line extending to the right.

Roger Simpson