

24 January 2017

Mr Gavin Crooks  
Case Manager  
Operations 3  
Anti-Dumping Commission  
Level 35  
55 Collins Street  
Melbourne Victoria 3000

Received 2 February 2017

Email: [Gavin.Crooks@adcommission.gov.au](mailto:Gavin.Crooks@adcommission.gov.au)

**Public File**

Dear Mr Crooks

**Re Investigation No. 362 – Market offers for Malaysian aluminium extrusions**

I refer to Capral Limited's ("Capral") submission dated 6 December 2016 that provided price offers Capral had encountered in the Australian market for aluminium extrusions exported from Malaysia. Capral's submission identified a number of quotations for supply by Malaysian exporters in prices ranging from [range] per kg for mill finish at prices that undercut Capral's prices. The identified price offers (ex Malaysia) were as follows:

- (i) Offer (Level of sale, customer)

[Details of price offer – commercially sensitive].

Further to this, it is noted that in their exporter questionnaire [exporter] pays a commission to [importer] from this price.

- (ii) [customer] – Malaysia supply

Capral is aware that [customer] has been receiving some volumes from [details of price and Capral offer – commercially sensitive].

Capral has also made representations (dated 14 December 2016) to the Anti-Dumping Commission ("the Commission") that it contends that the market prices at which the exported aluminium extrusions are being offered in Australia are at a loss and that the Commission should examine whether export prices to Australia by the Malaysian exporter(s) are arms length.

In further support of these claims, Capral provides the following additional supporting evidence demonstrating that market prices of [range] per kg for mill finished aluminium extrusions supplied from Malaysia do not recover the full costs of production. The attached analysis (Confidential Attachment 1) provides a detailed breakdown of a constructed cost comparison for aluminium extrusions offered for supply in the [period] quarter of 2016. The analysis commences with a cost associated [commercially sensitive cost and pricing details].

[Commercially sensitive breakdown of cost information].

[Further details of cost breakdowns – commercially sensitive].

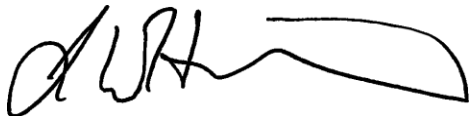
The aggregate costs to manufacture and export to Australia and land in store – excluding a level of profit, and a margin for the Australian importer – is approximately [commercially sensitive pricing details] per kg for mill finished product.

The attached analysis confirms that market offers for Malaysian aluminium extrusions (based upon mill finish) that are priced at [range] per kg are export sales made at a loss. Declared export prices (as per export invoices) cannot be relied upon as reflecting arms length transactions, and it is essential for the Commission to undertake deductive export price calculations to determine correct export prices (for Malaysian exports to Australia during the investigation period).

Capral re-states earlier representations that based upon market offers for Malaysian aluminium extrusions declared export prices are not at arms length.

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