

28 May 2018

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

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### Public File Version

Dear Mr King

#### **Investigation No. 442 – Aluminium Extrusions exported from P R China and Thailand – Comments re RCR International Pty Ltd submission of 23 April 2018**

I refer to the submission on behalf of RCR International Pty Ltd (“RCR”) dated 23 April 2018 that seeks to challenge that aluminium extrusions manufactured by the Australian industry are not like goods to those imported by RCR.

RCR contends that the locally produced goods “do not bear a commercial or functional likeness to the RCR goods”.

Capral Limited (“Capral”) disputes the assertions made by RCR. It is contended by RCR that the Australian industry and the imported goods do not compete in the “same market sector”. Essentially RCR is arguing that it does not sell imported aluminium extrusions into the “industrial” sector of the Australian market; rather, it focuses on so-called “customer channels” which includes “DIY and DIFM retail customers” that source goods from hardware retailers.

RCR further claims that its imported products are “generic profiles intended to be used in handyman at-home projects” that are not customised for a particular end-use and not suitable for commercial applications. The RCR submission then refers to G James Australian Industry Questionnaire response where it is stated (by RCR) that G James did “not identify a customer channel or market in which it operates which coincides with RCR’s target market.”

Capral rejects the assertions of RCR that the Australian industry does not supply the retail “channel” that includes handyman and DIY consumers. Capral has provided the Anti-Dumping Commission (“the Commission”) with a breakdown of its sales via the manufacturing and distributor channels which includes:

- Wholesaler or distributor;
- Retailer;
- Fabricator, end user or industrial/commercial; and
- Extruder.

The Commission is also in possession of information (via Capral’s Confidential Appendix A4 schedules) that identifies the customers to which Capral has sold aluminium extrusions. Capral has sold aluminium

extrusions (that may be considered 'generic' in form) to the following [customers] during the investigation period:

- [customer]
- [customer]
- [customer]
- [customer]
- [customer]
- [customer]
- [customer]
- [customer]

In addition to the home-handyman [customer], Capral has sold locally produced aluminium extrusions to the following retail outlets:

- [customer]
- [customer]
- [customer]
- [customer]
- [customer]

Sales through retail outlets in the 2016/17 period accounted for approximately [percentage] of Capral's total sales of aluminium extrusions.

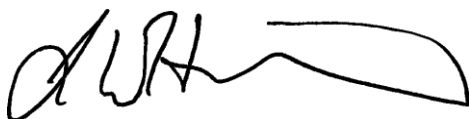
Locally manufactured aluminium extrusions are sold into the same channel(s) supplied by RCR and the locally produced goods possess the same commercial and functional characteristics as imported aluminium extrusions supplied by RCR.

Capral requests the Commission to take full account of the information provided by Capral concerning its sales in the 2016/17 investigation period. It is without question that supply channels to which RCR asserts it does not compete with the Australian industry are in fact also supplied by the Australian industry. The locally produced goods have the same essential characteristics as the imported goods (i.e. functional and commercial likeness) and the goods are used interchangeably in the so-called handyman and DIY applications.

Capral respectfully submits that RCR's assertions are not supported by the relevant facts concerning the supply of locally produced aluminium extrusions into retail channels on the Australian market.

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



Luke Hawkins  
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