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

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**Public File**

Dear Mr Crooks

**Investigation No. 362 – Purchase of aluminium ingot by exporters in Malaysia and Vietnam**

Capral Limited ("Capral") notes that the Anti-Dumping Commission's ("the Commission") verification reports in respect of cooperative exporters in Malaysia and Vietnam confirm that it has validated each exporter's purchase price for raw material aluminium ingot used in the manufacture of aluminium extrusions.

For clarification, Capral would like to remind the Commission that purchased aluminium should reflect the sum of:

- aluminium at prevailing London Metal Exchange ("LME") rate; plus
- billet premiums; plus
- Major Japanese Port ("MJP") premium (applicable to all aluminum purchases in South East Asia).

The aluminium purchase price for each exporter should, as a minimum, reflect the sum of these costs. Capral is aware that the MJP declined during the investigation period from above US\$ [REDACTED] per tonne to approximately US\$ [REDACTED] per tonne in July 2016. However, the exporter's raw material aluminium cost – if purchased from an unrelated party - must reflect the prevailing costs (as per the above) at the time of manufacture (or in the period immediately prior to manufacture) of the aluminium extrusion.

For parties that purchase raw material aluminium from a related party, the transfer price must reflect the above as a minimum. In the event that a related party purchase price is below the LME + Billet premiums + MJP premium – the Commission must view the aluminium transferred in at less than cost, and make an upward adjustment accordingly.

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