



Global Vietnam Aluminium Company Limited
My Xuan B1-Conac Industrial Zone, My Xuan Town,
Tan Thanh District, BR-VT Province, Vietnam

15 May 2017

Director, Operations 3
Anti-Dumping Commission
GPO Box 1632
Melbourne, VIC 3001

Investigation into alleged dumping of aluminium extrusions exported from Vietnam

Dear Director,

This submission is made on behalf of Global Vietnam Aluminium (GVA) in response to the submission by Capral Limited (Capral) dated 5 May 2017.

In that submission Capral submits that adjustment for cost differences '*must be shown or demonstrated to have impacted price*'. Whilst GVA agrees with this view, it is clear that Capral has misunderstood the primary concern and identified flaw in the Commission's approach to the determination of normal values. That is, GVA has not been provided with any information about the domestic sales and corresponding costs of the other exporters, to allow it an opportunity to identify cost differences which would enable an adjustment claim to be made.

For example, GVA is aware of its raw material costs and it is not disputed that these costs would affect the corresponding price of the finished goods. However, GVA has no understanding whether its raw material costs are cheaper than that of the other exporters, and whether in that circumstance an adjustment is required to the domestic selling prices as a result of the higher raw material costs incurred by the other exporters.

So GVA's primary concern is that procedural fairness has not been provided, and which has prevented the identification of appropriate adjustment claims aimed at ensuring proper comparison between normal values and corresponding export prices.

Further, Capral states that '*GVA has indicated its support to the Commission's basis for normal values under subsection 269TAC(1)*'. It then adds that '*... GVA has not submitted information to the Commission evidencing price impact. GVA has had sufficient time following the notification that it was a 'selected' exporter to provide this information.*'

This first statement by Capral is plainly incorrect. In its submission in response to SEF 362, GVA made clear that it '*submits that the use of other seller's domestic sales pursuant to subsection 269TAC(1) of the Act to be inappropriate.*' [emphasis added]

Capral is again misunderstood in making the second statement. Adjustments are made '*for differences which affect price comparability*'¹. That is, where a factor affects the proper price comparison of the normal value and corresponding export price, due allowance shall be made to

¹ WTO Anti-Dumping Agreement, Article 2.4.

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remove the impact of that factor on price comparability. In GVA's circumstances, it is completely uninformed of the terms and conditions or circumstances and factors affecting the domestic prices made by the other exporters, to properly present legitimate adjustment claims to the Commission in a timely manner.

Yours Sincerely

General Director

Jacky Cheung