

**Responses on SEF181 – INVESTIGATION - ALLEGED DUMPING AND
SUBSIDISATION OF ALUMINIUM ROAD WHEELS (ARWs) FROM CHINA:
Zhejiang Jinfei Kaida Wheel Co., Ltd.**

Via Email: tmops2@customs.gov.au

Director Operations 2

Trade Measures Branch

Australian Customs and Border Protection Service

Dear Sir/Madam,

Regarding to Statement of Essential Facts Number 181 (SEF181) in relation to the above investigation dated on 27 April 2012, we would like to response as follows:

1. In SEF181 and confidential attachment 1 of dumping margin calculation, Australian found that the dumping margin of Jinfei Kaida was 7.5% on the basis of comparing the export price and constructed normal value. We noted that Australian Customs had changed the normal value in confidential attachment 1 of SEF181 without any resource or calculation methods from the final visit report of Jinfei Kaida in which Australian Customs found that the dumping margin of Jinfei Kaida was -3.1%. So, we consider that the final visit report of Jinfei Kaida Australian Customs had made is correct and reliable. Please see the Revised DM.xlsx of Jinfei Kaida's final visit report.
2. In the SEF181, Arrowcrest's market share of AM segment was always exactly stable from FY2008 to FY2011. And for the total market share, Arrowcrest was also stable from FY2008 to FY2011. Imports from China increased due to the decline of imports from other countries. For the consideration of profitability, Arrowcrest's total profit and profitability during the injury analysis period also keep stable from FY2007 to FY2011, except a loss situation in FY2009. Based on this analysis, Arrowcrest did not suffer any injury in the form of market share and profit. So, the imports from China has not caused material injury to the Australian industry.