

27 April 2023

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Anti-Dumping Commission  
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Dear Sir/Madam

**Public File**

**investigation No. 618 – Accelerated Review – Antai Technology Co., Ltd**

**I. Introduction**

We refer to the Exporter Questionnaire Response (“EQR”) by Antai Technology Co., Ltd (“Antai”) of China in accelerated review investigation No. 618.

Antai states at Section 5 of its application that it is a “new exporter” and did not export aluminium extrusions the subject of the anti-dumping and countervailing notices during the original investigation period (i.e. 1 July 2008 to 30 June 2009).

**II. Eligibility**

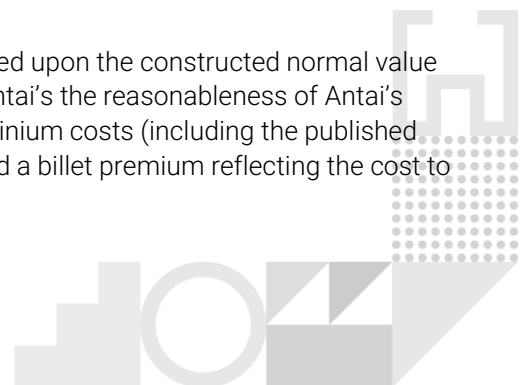
Capral Limited (“Capral”) notes that Antai was formerly known as Fujian Zhangzhou Antai Aluminium Co., Ltd to Antai Technology Co., Ltd in 2021. Antai’s EQR response indicates that Antai (and its former entity) have been involved with the manufacture and sale (both domestic and export) of aluminium extrusions for some time. Section 269ZE(3)(b) of the Customs Act 1901 indicates that an accelerated review may be terminated where “the exporter is related to an exporter whose exports were examined in relation to the application for the publication of that notice”.

It is not clear from the applicant’s EQR whether it has related parties that may have been involved in the export of goods in the original investigation period. Capral encourages the Anti-Dumping Commission (“the Commission”) to request information on all related party entities to the applicant.

**III. Normal value**

The Commission has previously determined (Report 543) that a particular market situation continues to apply for aluminium extrusions sold domestically in China.

The Commission has therefore determined normal values for the exporter based upon the constructed normal value methodology under subsection 269TAC(2)(c). The Commission will assess Antai’s the reasonableness of Antai’s production costs, and make appropriate adjustments to the raw material aluminium costs (including the published LME price for primary aluminium, the MJP premium, inland transport costs and a billet premium reflecting the cost to convert ingots to a billet in the manufacture of the goods).



This will ensure that the normal value determined for Antai will reflect a selling price unaffected by the influence of the Government of China ("GOC") on raw material input costs.

Amounts for selling, general and administrative expenses ("S,G&A") in accordance with Section 44(2) of the Regulations, and profit in accordance with Section 45(2) of the Regulation.

In examining relevant adjustments to the exporter's normal value, Capral would highlight with the Commission its finding in Report 530 that *"the findings in previous aluminium extrusion cases generally support that the cost of packaging for export sales was generally higher than for domestic packaging"*. It is noted at Section E-2.6 that Antai states "There are no distinct differences in packaging between domestic and export sales". The Commission's findings in Report 530 confirm this is not the case and that additional packaging is required for exported goods.

Capral anticipates that the Commission will adjust Antai's normal value to account for differences in packaging costs between domestic and export markets.

#### IV. Subsidies

It is noted that Antai is in receipt of a broad range of subsidies received from the GOC in the form of grants. In 2022, Antai received some 25 different grants from the GOC.

Capral notes that with this high volume of individual grants identified by Antai it is likely that the Commission will encounter previously unidentified grants provided by the GOC. Capral seeks the Commission to ensure that any new grants are correctly quantified and that the grants are considered in future investigations (including the current investigation) involving aluminium extrusions exported to Australia from China.

Capral has observed that the applicant's production facility is located in the Guangshan industrial Park, Zhangzhou City, Fujian Province. Capral is aware that entities located in Industrial Parks have, historically, benefited from reduced taxation and/or exemptions for specified periods.

Capral requests that the Commission investigate Antai to establish whether the manufacturer has received benefits in the form of reduced taxation liabilities or other benefits from the GOC (including from local government).

#### V. Non-Injurious price

Consistent with Accelerated Review Investigation 530, Capral recommends that the Commissioner be satisfied that as the situation in the Chinese aluminium market is such that sales are not suitable for normal value purposes (i.e. a particular market situation exists), and the Minister is therefore not required to consider the lesser duty rule.

As the lesser duty would not be considered, Capral proposes that the full dumping margin be applied to any IDD (and ICD) in respect of Antai's exports to Australia.

#### VI. Form of measures

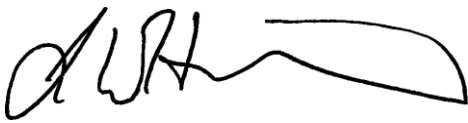
Antai is currently the subject of the "all other exporters" effective rate of duty. Capral recommends that that in respect of any IDD (and ICD) that becomes payable by Antai that the duty method payable is based upon the combination method (i.e. the fixed and variable components) as currently applies to Chinese exporters of aluminium extrusions to Australia.



Additionally, as it is likely that ICD is payable, the duty collected is the sum of the IDD and ICD on Antai's exports to Australia.

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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