



25 June 2023

**Public Record**

**BEFORE THE ANTI-DUMPING COMMISSION**

In the matter of the Review of Anti-dumping Measures  
Applying to Aluminium Extrusions Exported to Australia from  
The People's Republic of China

NO. 609

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**Submission on the Statement of Essential Facts**

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Company:  
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- [1] Goomax Metal Co., Ltd (Hereinafter referred to as “Goomax”) is a Chinese exporting producer of aluminium extrusions. In the review of anti-dumping measures applying to aluminium extrusions exported to Australia from the People’s Republic of China No. 609 (Hereinafter referred to as “Review 609”), Goomax was one of the selected exporters, and has fully cooperated in the review.
- [2] On 8 June 2023, the Commission published the Statement of Essential Facts for Review 609 (Hereinafter referred to as “the SEF”).
- [3] Goomax hereby submits the following comments on the SEF.
- [4] According to the SEF, the recommended method for interim dumping duty (Hereinafter referred to as “IDD”) for Goomax is floor price, and the floor price is equal to the ascertained normal value. It means that, after the recommended IDD becomes effective, if the actual export price is below the ascertained normal value, the difference between the actual export price and the ascertained normal value will be payable as IDD.
- [5] According to the SEF, the ascertained normal value for Goomax was calculated using the sum of:
- the cost of production of the goods in China, which was calculated using the cost to make (CTM) expenses for Goomax, with its primary aluminium costs adjusted by reference to a benchmark
  - domestic SG&A on the assumption that the goods, instead of being exported, were sold domestically based on the company’s records, and
  - an amount for profit based on data relating to the production and sale of like goods on the domestic market in the OCOT.
- [6] Goomax would like to indicate that, the review period for the current review is 1 July 2021 to 30 June 2022, during which period, the situation of COVID-19 was quite serious, which caused the price for aluminium (including both aluminium ingots and aluminium rods) at the peak. The average benchmark for aluminium ingots and aluminium rods determined in the current review is nearly 50% higher than the average benchmark for aluminium ingots and aluminium rods

determined in the Continuation Inquiry No. 543, the inquiry period of which was 1 January 2019 to 31 December 2019, before the outbreak of COVID-19.

- [7] Therefore, the aluminium price during the review period is much higher than the current level and is expected to be much higher than the level in the future after the recommended IDD becomes effective. Considering that aluminium ingots and aluminium rods are the main and important raw materials of aluminium extrusions, the price of which has a key influence on the price of aluminium extrusions, the ascertained normal value constructed for Goomax in the current review is expected to be higher than the market price in the future.
- [8] Under this circumstance, to use the ascertained normal value constructed in the current review as the floor price is inappropriate due to the exceptional situation of the aluminium price during the COVID-19 period. And corresponding adjustments to the IDD method or the floor price are necessary.
- [9] Goomax hereby respectfully requests the Commission to take Goomax's above comments into consideration and make corresponding adjustments in the floor price.

Submitted on behalf of Goomax Metal Co., Ltd,

  
Vivian Wang

Partner