

9 August 2023

██████████
A/g Case Manager
Investigations 3
Anti-Dumping Commission
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Dear ██████████

Public File

Review of Measures Investigation No. 609 – Submission by Press Metal International Ltd of 31 July 2023

We refer to the recent submission dated 31 July 2023 by Press Metal International Ltd (“PMI”) on respect of the above review of measures investigation (Invest 609).

The PMI submission has raised certain matters that Capral Limited (“Capral”) considers require a response at this late stage of the review of measures investigation.

PMI states that Capral is concerned with the increase in exports from China. We are concerned about the measures reflecting contemporary prices for aluminium extrusions. The current measures were determined for an investigation period (Invest 482) that reflected prices for aluminium that were approximately 30-40 per cent below the levels of the current investigation period. We stated this as a reason for the increase in Chinese exports to Australia.

PMI contends that the variable factors should not be reviewed as the *“rise and fall in aluminium prices....are reflected by a corresponding rise and fall in the prices of aluminium extrusion products”*. This would be the case in an ideal world. The Anti-Dumping Commission (“the Commission”) has confirmed in Statement of Essential Facts No. 609 (“SEF 609”) that the Chinese exporters Qingyuan City Huanan Copper and Aluminium Co., Ltd (“Qingyuan”) and Foshan Lvqiang Metal product Co., Ltd (“Foshan Lvqiang”) that were the subject of measures¹, accounted *“for a large volume of goods exported during the review period”*. It is apparent that the rise and fall in aluminium prices **do not** translate to subsequent rises and fall in the prices of aluminium extrusions.

We reject PMI’s assertions that the objective of the review of measures investigation is to exclude Chinese exports from the Australian market. We welcome competition from imports at fair prices. The Commission’s SEF 609 confirms that some exporters the subject of the measures disregard the applicable measures and export at prices that are at dumped levels. The review of measures investigation that has occurred approximately mid-way through the term of the five-year extension of measures is appropriate following the confirmation of further instances of dumping.

It is further noted that PMI is seeking the Commissioner to vary the review period to reflect more recent changes

¹ Qingyuan and Foshan Lvqiang’s current variable factors were last ascertained in February 2020 following Accelerated Review No. 530 and July 2021 following Accelerated Review No. 581 when both exporters had no exports to Australia.



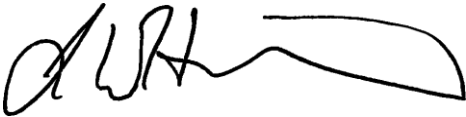
to prices in aluminium. Capral has confirmed its understanding of the use of data from the review period and any subsequent periods in its 18 July 2023 submission.

The PMI submission has loosely contended that the import prices of aluminium extrusions reflect rises and falls in aluminium. The Commission's inquiries in Invest 609 have confirmed that this claimed position is not what occurs in all trade for aluminium extrusions.

Capral requests the Commissioner to confirm to the Minister that the variable factors applicable to Chinese exporters have changed and that the proposed changes to the variable factors as recommended in SEF 609 be applied (except that the date of application of the revised measures for the two Chinese exporters Qingyuan and Foshan Lvqiang be from the initiation date of the review of measures investigation).

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
General Manager – Supply and Industrial Solutions

