

20 August 2018

Ms Leisa Baynham
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Anti-Dumping Commission
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Public File

Dear Ms Baynham

Investigation No. 482 – Review of measures inquiry – aluminium extrusions exported from P R China – model matching

I. Introduction

The recent publication of Australian Dumping Notice (ADN) No 2018/111 commenced the review of measures investigation in respect of aluminium extrusions exported from the People's Republic of China ("China").

The goods the subject of measures are as follows:

Aluminium extrusions produced via an extrusion process, of alloys having metallic elements falling within the alloy designations published by The Aluminium Association commencing with 1, 2, 3, 5, 6 or 7 (or proprietary or other certifying body equivalents), with the finish being as extruded (mill), mechanical, anodized or painted or otherwise coated, whether or not worked, having a wall thickness or diameter greater than 0.5 mm, with a maximum weight per metre of 27 kilograms and a profile or cross-section which fits within a circle having a diameter of 421 mm.

A further clarification of the goods as specified in ADN 2018/111 includes:

"The goods include aluminium extrusions that have been further processed or fabricated to a limited extent, after aluminium has been extruded through a die. For example, aluminium extrusion products that have been painted, anodised, or otherwise coated, or worked (e.g. precision cut, machined, punched or drilled) fall within the scope of the goods."

This preceding outline of the goods identifies the finishes as mill finish goods, along with goods that painted, anodised, or otherwise coated or worked.

For fair comparison purposes, Capral Limited ("Capral") submits that in addition to considering the finish of the good, it is also appropriate to examine the alloy type, temper grade and micron level.

II. Model matching

In Investigation 442 the Anti-Dumping Commission (“the Commission”) conducted a verification with the exporter in Thailand United Aluminium Industries Co.,Ltd (“UAI”). The exporter verification visit for UAI confirmed that for model matching purposes, the Commission “*considers it appropriate to model match the export sales of the goods to the domestic sales of like goods based on the following criteria:*

- *Finish (Mill Finished, Powder Coated, Anodised, Bright Dip Anodised);*
- *Alloy type; and*
- *Temper grade.” and*
- *Further processed including cutting, machining, punching or drilling)*

Capral contends that the approach followed by the Commission with UAI in Investigation 442 is a preferred basis for model matching as opposed to simply matching on the basis of finish-only (as has been followed in previous review investigations involving exports from China).

A model matching comparison that includes alloy type, temper grade and further value adding provides for a more relevant and fair comparison of the domestic and exported goods.

The particular alloy used in the manufacture of the goods influences the designated end-use and finish – that is whether the good is to be further worked (e.g. forming, machining, welding, soldering) and what type of finish is to be applied (e.g. anodizing). The selection of alloy will influence the production cost of the good, hence, is a relevant consideration in model matching.

Typical alloy types include (but not limited to) 6060, 6061, 6063, 6101, 6106, 6005A, 6082, and 6351. The 6000 series alloys are general purpose alloys that incorporate manganese and silicon and are versatile, heat-treatable aluminium with good corrosion resistance and good mechanical properties.

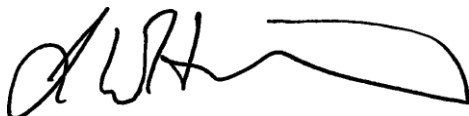
III. Recommendation

Capral recommends that the Commission follow the methodology adopted in the verification investigation involving the Thai exporter of aluminium extrusions, UAI. This methodology correctly involved the matching of aluminium extrusions produced reflecting finish, alloy type, temper grade and further processing.

Capral is willing to assist the Commission’s verification teams with further understandings concerning the relevant criteria for model-matching purposes, as required.

If you have any questions concerning the attached updated financial data, please let me know. I can be contacted on (02) 8222 0113 or you may contact Capral’s representative Mr John O’Connor on (07) 3342 1921.

Yours sincerely



Luke Hawkins
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