

Director, Investigations 4
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601
Australia

17 August 2018

Dear Sir,

NON-CONFIDENTIAL – Public Record

Re: Review of Measures Applying to Aluminium Extrusions Exported to Australia from the People's Republic of China – Anti-Dumping Notice No. 2018/111

Please find following our submission in respect of the above.

Executive Summary

- CW Products is a leading Australian manufacturer of aluminium roller shutters. We are a family owned business that employs approximately 60 people, based in the South Australian regional hub of Murray Bridge. We also have operations in Melbourne and Sydney. We have been in business since 1984.
- As part of the manufacturing and distribution process, CW Products has a significant requirement for aluminium extrusions that are sourced from both local and Chinese suppliers.
- In March 2017 the Australian Anti Dumping Commission ("AIDC") undertook a review of rates for all Chinese aluminium extrusion exporters.
- The process that the AIDC undertook was to directly contact 5 major exporters to advise them of the review and to request these exporters to complete a questionnaire within a specified timeframe. In respect of all other exporters, **the onus was placed on the importers** to contact the exporters for completion of the questionnaire.
- Our exporter was not one of the 5 major exporters referred to above. Accordingly, the onus was on us to contact our exporter to advise them of the need to complete the questionnaire.
- However, we were not made aware that a review process had commenced. AIDC advised us that they had notified us of the review and the exporter notification requirements, however we were (and still are) unable to locate any correspondence (mail or email) from AIDC of same. Further, upon request, the AIDC was unable to provide us with evidence (such as a communication copy or reference) that they had contacted us.
- The result of the above was that we were unable to meet the requirements of the review process within the specified timeframe; the end result of this was that AIDC placed our exporter in the

maximum applicable rate category.

- It is also important to note that, in respect of the time period of the review, there was no change in our exporter's pricing that would have otherwise warranted a change in rate category.
- We found out about this rate category change from our freight forwarder. Our freight forwarders were as surprised by these changes as we were. They were also unaware of the review.
- We were advised by AIDC that we are unable to request a review of these rates for 12 months.
- The change of our exporter's rate category forced us into a precarious position regarding our suppliers. Initially, we estimated that it would take us around 6 months to transition to new suppliers, either locally or to alternative international exporters. This is due to quality, tooling, paint and packaging considerations. However, we underestimated the time and effort required to source alternate suppliers.
- Accordingly, we have had to commit to our existing Chinese exporter to ensure continuity of supply as we continue our search for alternative supply arrangements.
- The rate reclassification of our exporter has had a severe impact on our business. We operate in a highly competitive environment. We have had to absorb these costs as passing such costs onto our customers would materially undermine our position in the marketplace.
- Such significant cost implications severely affect our competitiveness and compromise our ability to add value locally and support Australian manufacturing.
- We request that the maximum rate category applied to our exporter be reversed to the previous duty rate.
- Further, we request that AIDC reviews its notification processes and to allow extra time in the instance, such as this, where the importer has not been made aware of the review requirements.

CW Products is committed to Australian manufacturing and is grateful for your assistance in helping achieve a favourable outcome.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Danny Elasaad', written in a cursive style.

Danny Elasaad
Executive Director
CW Products