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18 October 2018

Ms Leisa Baynham

Assistant Director

Investigations 4

Anti-Dumping Commission

GPO Box 2013

CANBERRA ACT 2601

Email: leisa.baynham@adcommission.gov.au

Public File

Dear Ms Baynham

Investigation No. 482 – Review of measures inquiry – aluminium extrusions exported from

P R China – Clenergy (Xiamen) Technology Co Ltd

I. Background

I refer to the recent file note placed on the electronic public file (EPR Document No 27) concerning the status of exporter questionnaire response's ("EQR") received in relation to Investigation No. 482 – the review of measures on aluminium extrusions exported from the People's Republic of China ("China").





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It is noted from the file note that Clenergy (Xiamen) Technology Co., Ltd (“Clenergy”) is a “non-selected” exporter. As a non-selected exporter, the Anti-Dumping Commission (“the Commission”) is currently not intending to conduct a verification visit with the exporter Clenergy.

II. Clenergy EQR

According to the Clenergy EQR the company claims that it does not:

- Sell the aluminium rail (anodised) individually; and
- It does not have a price list for its exports of aluminium extrusions as sold in Australia.

It is Extrusions Australia’s (“EA”) understanding that both claims are incorrect.

EA has attached for the information of the Commission:

- Drawings relating to the individual rails that Clenergy has supplied to a customer in Australia which align with the locally produced goods supplied by EA (refer Confidential Attachment 1); and
- A price list that details individual extrusions as sold by Clenergy Australia (refer Confidential Attachment 2).

The Clenergy EQR also confirms that Clenergy is an exporter of the goods but not the manufacturer. Clenergy has sought to obtain assistance from its suppliers concerning costs, however, it does not appear that Clenergy has been able to provide manufacturing costs in relation to the goods exported to Australia.

For the purposes of the Review Investigation No. 482, Clenergy cannot be considered a manufacturer of the aluminium





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exported to Australia. Clenergy, therefore, should be included in the category of “Other Exporters” – that is, those exporters that are deemed uncooperative due to the absence of a sufficiently completed EQR.

III. Clenergy pricing

EA would also highlight with the Commission that the Clenergy Australia price list identifies [*finish type*] rail at a price that is similar to the pricing at which EA sells its locally manufactured [*finish type*] product. Clenergy Australia, therefore, is selling at prices which significantly undercut the Australian industry.

EA understands that Clenergy is related to its Australian importer – KerryJ Investments Pty Ltd – that trades as “Clenergy Australia”. Due to this relationship and the evident price undercutting that is reflected in its selling prices for [*finish type*] rail versus EA’s mill finish product, EA encourages the Commission to determine export prices for Clenergy on the basis of the deductive export price method (i.e. in accordance with subsection 269TAB(1)(c).

If you have any questions concerning this submission, please do not hesitate to contact me on (03) 8348 9300, or the Australian industry representative Mr John O’Connor on (07) 3342 1921.

Yours sincerely

A handwritten signature in blue ink that reads "Rod Fiddes".

Rod Fiddes

Managing Director

