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14 March 2019

Director
Investigations 4
Anti-Dumping Commission
GPO Box 2013
CANBERRA ACT 2601

Dear Sir/Madam,

Abra Aluminium Pty Ltd (Abra)
Review of Anti-Dumping Measures applying to aluminium extrusions exported to Australia from the People's Republic of China
No. 482
NON-CONFIDENTIAL

We confirm we act for Abra.

We refer to the Statement of Essential Fact (**SEF**) published on 22 February 2019. We are instructed to make the following preliminary submission in response to the SEF on behalf of Abra.

1 Background and enclosures

- 1.1 We are instructed that our client imports certain aluminium extrusions known as [REDACTED] [MILLIMETRE] Standard Fly Frame extrusions (**Goods**) which it considers are eligible for an exemption from measures as those Goods are not and cannot be produced by the Australian industry.
- 1.2 Please find **enclosed** the following documents in support of client's position that the Goods should be exempted from measures:
- (a) Drawings of the Goods which include relevant specifications;
 - (b) Emails from the following Australian extruders which confirm that they are not able to produce the Goods:
 - (i) Extrusions Australia;
 - (ii) Almax; and
 - (iii) Capral.

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2 Please note all enclosures are confidential.

3 Description of the Goods

3.1 As discussed above the Goods are described as [REDACTED] [MILLIMETRES] Standard Fly Frames with the following specifications:

- (a) [REDACTED] [WALL THICKNESS AND TOLERANCES];
- (b) [REDACTED] [GRADE AND TEMPER]; and
- (c) [REDACTED] [WEIGHTS].

4 Australian extruders

4.1 The Australian extruders listed above have confirmed that they are not able to produce the Goods as the extrusions are too light for the presses available and the wall thickness required is too thin. Specifically:

- (a) Capral has confirmed in its email to Abra that the wall thickness required is too thin and that it would require a minimum wall thickness of [REDACTED] [MILLIMETERES].
- (b) Almax has confirmed that, due to the size of its presses, it is not able to offer such a thin wall thickness and would only be able to provide an extrusion with a wall thickness double that required.
- (c) Extrusions Australia has confirmed that the thinnest wall thickness it can provide is [REDACTED] [MILLIMETRES] with its presses. Extrusions Australia's representative has also stated that he does not believe that there are presses in Australia capable of producing an extrusion with the required wall thickness.

4.2 We are instructed that our client has made further requests of other Australian extruders and is awaiting responses to those requests. We will provide the ADC with copies of those responses once received.

We request that the ADC consider exempting the Goods from measures on the grounds that they are not produced by the Australian industry. We would be pleased to provide any further information the ADC may require.

Yours faithfully

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A handwritten signature in black ink, consisting of a stylized, sweeping stroke that starts with a sharp upward curve and ends with a long, horizontal tail.

Andrew Hudson
Partner

Encls.

